

Registration No 74578-7

NEW APPLICATIONS

DATE: 10/10/12

FILE NUMBER: 74578-T

FEP (OPPIN ENTRY) (SB) ^{OCT 10 2012}
(Initial & date)

FILE ROOM: _____
(Initial & date)

SIG: _____
(Initial & date)

FILE ROOM: _____
(Initial & date)

___ ASSIGN TO PM ___ (NO DATA)

___ JACKET TO SHELF (DATA)

Material Sent for Data Extraction

Reg. # 74578-7

Description: Add an approved language

☐ Material(s) Sent to Data Extraction Contractors:

☐ New Stamped Label Dated _____

☐ Notification Dated _____

☐ New CSF(s) Dated 1-16-14

☐ Other: _____

☐ Decision #: 486994

☐ Other Action/Comments: _____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Bombardier 1/2/14

Phone: 305-7269 Division: RSB

Date: 1-30-14



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Ms Christina Griffin
Arborjet, Inc.
C/o Delta Analytical Corp.
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

JAN 29 2014

Subject: Product Name: Arbor-OTC
EPA Reg. No. 74578-7
Submission date: 1/6/14
Notification for label change per PRN 98-10: Addition of an approved language
Decision Number 486994

Dear Ms Griffin:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 1/6/14 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have questions concerning this letter, please call Banza Djapao at 703-305-7269 or via email at djapao.banza@epa.gov, or you may call me at 703-308-3194.

Sincerely,

A handwritten signature in black ink, appearing to read "Shaja B. Joyner".

Shaja B. Joyner
Product Manager 20
Fungicide Branch
Registration Division (7504P)



1/13

January 6, 2014

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive, Room S-4900
Arlington VA 22202

Attn: Shaja Joyner, PM 20

RE: Notification per PR Notice 98-10 to make a minor label revision
Product: Arbor-OTC
EPA Reg. No.: 74578-7
Company: Arborjet, Inc.

Dear Ms. Joyner:

On behalf of Arborjet, Inc., I am submitting a notification per PR Notice 98-10 to make a minor label addition for the product Arbor-OTC, EPA Reg. No. 74578-7.

The minor label revision includes the addition of the already approved language "[Non-crop bearing ornamentals only]" to page 11 of 11. We are repeating language that has already been approved on this label under Directions for Use, page 7 of 11, bottom paragraph, the phrase just before the bolded sentence. No other changes have been made to the label.

Enclosures:

- EPA form 8570-1
- One copy of the revised label, addition highlighted (Page 11 of 11)

If you have questions, please contact me at 301-680-7971 or cgriffin@delta-ac.com.

Sincerely,

Cristina Griffin
Agent, Arborjet, Inc.

1/13



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

NOTIF**Application for Pesticide - Section I**

1. Company/Product Number
74578-7

2. EPA Product Manager
Shaja Joyner

3. Proposed Classification
☐ None ☐ Restricted

4. Company/Product (Name)
Arbor-OTC

PM#
20

5. Name and Address of Applicant (Include ZIP Code)
**Arborjet, Inc.
c/o Delta Analytical Corp.
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904**

Check if this is a new address

6. **Expedited Review.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

Section - II

☐ Amendment - Explain below
☐ Resubmission in response to Agency letter dated _____
☒ Notification - Explain below.

☐ Final printed labels in response to Agency letter dated _____
☐ "Me Too" Application.
☐ Other - explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification per PR Notice 98-10 to make a minor revision to the label.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III**1. Material this Product will be Packaged in:**

Child-Resistant Packaging
☐ Yes* For retail
☐ No

Unit Packaging
☐ Yes
☐ No

Water Soluble Packaging
☐ Yes
☐ No

2. Type of Container
☐ Metal
☐ Plastic
☐ Glass
☐ Paper
☐ Other (Specify)

* Certification must
be submitted.

If "Yes,"
Unit Package wgt. No. per
container

If "Yes,"
Unit Package wgt. No. per container

3. Location of Net Contents Information

☐ Label ☐ Container

4. Size(s) of Retail Container**5. Location of Label Direction**

☐ On Label or:
☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product

☐ Lithograph ☐ Paper glued ☐ Stenciled
☐ Other: _____

Section - IV**1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)**

Name
Cristina Griffin

Title
Agent for Arborjet, Inc.

Telephone No. (Include Area Code)
201-680-7971

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any kind of knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature

4. Typed Name
Cristina Griffin

3. Title
Agent for Arborjet, Inc.

5. Date
January 6, 2014

6. Date Application
Received

(Stamped)

JAN 29 2014

ARBOR-OTC

[Sub-label 1: Palm Tree Use]

[Injectable Tree Antibiotic]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing palms including Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline).

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none"> Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

[See inside booklet for [First Aid], Restrictions and Precautionary Statements]

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-7
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

Arboriculture in Motion®

Arbor-OTC is a [registered] trademark of Arborjet, Inc.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

This product contains the antibiotic oxytetracycline. To reduce the development of drug-resistant bacteria and maintain the effectiveness of this and other antibacterial products, this product should be used only to treat or prevent infections that are proven or strongly suspected to be caused by bacteria.

This material is not to be used for medical or veterinary purposes.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application in Palm Trees

Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline) in Palms using the Arborjet Injection System

Apply to Palms 3-4 times annually for continuous protection from Phytoplasma Disease. For suppression of symptoms in a symptomatic palm use up to 3 times the amounts described in the table under Application Instructions. Once symptoms subside return to a preventative dosing schedule.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate Number of Palms Treated
140 g (5.0 oz.)	1250 mls	1320 mls	50
28g (1.0 oz.)	250 mls	264 mls	10
5.6g (0.2 oz.)	50 mls	52.8 mls	2
2.8g (0.1 oz.)	25 mls	26.4 mls	1

1. Determine total number of doses desired for project or container size.
2. Add quantity of ARBOR-OTC from [step one] or [first column] into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 10 palms.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Application Instructions: Due to the nature of the Palm's vascular system only one injection site is needed per palm per application.

Small Palm	Average Palm	Large Palm
< 6' Clear Trunk	6' – 15' Clear Trunk	> 15' Clear Trunk
16 mls of Solution	~26 mls of Solution	35 mls of Solution

Trunk diameter should be taken into consideration. A small trunk diameter can reduce by one category the dose required and a large trunk diameter can increase by one category the dose required

Treating Palms

Inject into the trunk into lignified (hardened, woody) tissues typically within 2-3 ft. of the soil. Drill into the stem 4" as instructed below. Inject through the Arborplug. Only one injection site is needed.

Using the STINGER Tip for Palms

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfect needles between trees.

Using Arborplugs™ for Palms

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug using the set tool and hammer. Inject by Inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Additional Injections in a Single Palm:

Additional injections can use the same hole as long as new tissue is accessed deeper in the hole. For additional injections:

Arborplug

Remove the plug and use a 3/16 drill bit and drill 1/2 inch deeper.

Drill the Arborplug hole 1/2 inch deeper and replace it with a new Arborplug*.

Inject Prescribed dose as instructed above using Arborplug.

Stinger

Use 3/16 inch drill to drill hole ½ inch deeper

Inject prescribed dose as outlined above for Stinger Tip

*Note: If you originally used the # 3 Arborplug, for re-treatment we recommend replacing with a # 4 Arborplug to more easily make the application using the original injection site.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool (<77°F, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer for recycling if available. If not, discard in sanitary landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Notice: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Tree injury, ineffectiveness or other unintended consequence may result because of such factors as manner of use or application, weather or tree conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ARBORJET, INC., or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ARBORJET, INC. and Seller harmless for any claims relating to such factors.

ARBORJET, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions. This warranty does not extend to the use of the product contrary to label instructions, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARBORJET, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

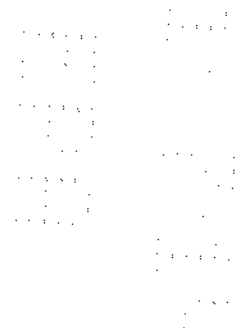
To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

ARBORJET, INC. and Seller offer this product, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of ARBORJET, INC.

**Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801**

This label may contain some or all of the following statements. ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Phytoplasma Disease
Palms



ARBOR-OTC

[Sub-label 2: Label for use in all other trees except Palm]

[Injectable Tree Antibiotic]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing trees including Bacterial Leaf Scorch and Fire Blight

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none">▪ Hold eye open and rinse slowly and gently with water for 15-20 minutes.▪ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.▪ Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">▪ Move person to fresh air.▪ If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.▪ Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

[See inside booklet for [First Aid], Restrictions and Precautionary Statements]

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-7
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

Arboriculture in Motion®

Arbor-OTC is a [registered] trademark of Arborjet Inc.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

This product contains the antibiotic oxytetracycline. To reduce the development of drug-resistant bacteria and maintain the effectiveness of this and other antibacterial products, this product should be used only to treat or prevent infections that are proven or strongly suspected to be caused by bacteria.

This material is not to be used for medical or veterinary purposes.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application Method

For treatment of Bacterial Leaf Scorch, Fire Blight and Ash Yellows using the Arborjet Injection System

Apply once per growing season in spring after leaves have fully developed. Scorch symptoms are suppressed only during the growing season in which treatment is administered. Re-treatment is required during each growing season for continued suppression.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate DBH inches of Tree Treated
140g (5.0 oz.)	1250 mls	1320 mls	500 inches
28g (1.0 oz.)	250 mls	264 mls	100 inches
2.8g (0.1 oz.)	25 mls	26.4 mls	10 inches
1.4g (0.05 oz.)	12.5 mls	13.2 mls	5 inches

1. Measure the tree diameter at breast height (DBH) to determine the dose that is needed.
2. Add quantity of ARBOR-OTC from [step one] or [first column] into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 100 DBH inches of trees.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Injection into Trees:

To determine the application/dose rate per tree:

- 1) Measure the tree diameter in inches at chest height (4½ feet from ground) to find the Diameter at Breast Height (DBH). (If measuring tree circumference, divide circumference by 3 to obtain the DBH in inches.)
- 2) Calculate the number of injection sites by dividing the DBH in inches by 2.
- 3) Divide the total dose by the number of injection sites to determine required dosage per injection site.

Example: For a tree with a DBH of 10 inches (or circumference of 30 inches):

- 1) DBH = 10" (circumference 30" ÷ 3 = 10").
- 2) Divide DBH of 10" by 2 = 5 injection sites.
- 3) Divide 26.4 mL by 5 injection sites = 5.28 mL per injection site.

Using the STINGER Tip

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfect needles between trees.

Using Arborplugs™

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug, countersink to the thickness of the bark using the set tool and hammer. Inject by inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Future Injections in the Same Tree:

Future injections in the same tree are applied into new holes placed intermediate to the old injection sites. Drill new sites either above or below (by 2" vertically) to the old sites and 2 to 3" horizontally from them. Applied correctly, this will form a triangular pattern with the old sites.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool (<77°F, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer for recycling if available. If not, discard in sanitary landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Notice: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Tree injury, ineffectiveness or other unintended consequence may result because of such factors as manner of use or application, weather or tree conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ARBORJET, INC. or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ARBORJET, INC. and Seller harmless for any claims relating to such factors.

ARBORJET, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions. This warranty does not extend to the use of the product contrary to label instructions, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARBORJET, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

ARBORJET, INC. and Seller offer this product, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of ARBORJET, INC.

**Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801**

This label may contain some or all of the following statements.

ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

[Non-crop bearing ornamentals only]

Ash Yellows	Cliff rose	Poplar
Ash	Cotoneaster	Walnut
Bacterial blast	Crabapple	Witches' Broom (caused by mycoplasma-like organisms)
Apple	Creambush	Apple
Pear	Firethorn	Ash
Bacterial Blight	Flowering Quince	Dogwood
Flowering Crabapple	Hawthorn	Elm
Hawthorn	Indian Hawthorn	Lilac
Lilac	Loquat	Locust
Walnut	Mountain Ash	Peach
Bacterial Canker	Ninebark	Sassafras
Hickory	Pear	X-Disease
Horsechestnut	Pearlbush	Cherry
Maple	Photinia	Chokecherry
Mimosa	Plum	Nectarine
Oak	Quince	Peach
Persian Walnut	Rose	Plum
Walnut	Serviceberry	
Bacterial Leaf Scorch	Fruit Spot	
Elm	Avocado	
Gum	Leaf and Shoot Blight	
Oak	Mock Orange	
Oleander	Leaf Blight and Brown Rot	
Sycamore	Mandarin Orange	
Blossom Blast	Leaf Spot	
Citrus	Basswood	
Grapefruit	Hibiscus	
Lime	Magnolia	
Tea rose	Lethal Decline	
Walnut	Basswood	
Blossom Blight and Canker	Hibiscus	
Almond	Magnolia	
Apricot	Phloem Necrosis	
Cherry	Elm	
Peach	Stein Canker	
Pear	Poplar	
Plum	Stubborn Disease	
Bunch Disease	Citrus	
Butternut	Tip Dieback	
Pecan	Maple	
Walnut	Vascular Yellows	
Crown Gall	Ash	
Flowering Quince	Elm	
Quince	Wetwood / Slime Flux	
Decline	Apple	
Peach	Cherry	
Pear	Elm	
Nectarine	Hickory	
Fire Blight	Maple	
Apple	Oak	
Apricot	Peach	
Cherry	Pear	
Chokecherry	Plum	

Material Sent for Data Extraction

Reg. # 74578-7

Description: label ~~amendment~~ notification

☒ Material(s) Sent to Data Extraction Contractors:

☐ New Stamped Label Dated 9/5/13

☐ Notification Dated _____

☐ New CSF(s) Dated _____

☐ Other: _____

☐ Decision #: _____

☐ Other Action/Comments: _____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: S. Hill

Phone: 703-347-8961 Division: RD

Date: 9/10/13



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

SEP 05 2013

Susan Stracquatano
Agent for: Arborjet Inc.
Delta Analytic Corporation
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

Subject: Notification request
Product Name: Arbor-OTC
EPA Reg. No.: 74578-7
Your submission: July 11, 2013
OPP Decision No.: 481060

Dear Ms Stracquatano:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10. The Registration Division has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please contact Shaunta Hill by phone at (703) 347-8961 or via email at hill.shaunta@epa.gov or myself at (703) 308-3194 or joyner.shaja@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Shaja B. Joyner", is written over the typed name.

Shaja B. Joyner
Product Manager 20
Fungicide Branch
Registration Division (7504P)

ARBOR-OTC

[Sub-label 1: Palm Tree Use]

[Injectable Tree Antibiotic]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing palms including Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline).

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none">▪ Hold eye open and rinse slowly and gently with water for 15-20 minutes.▪ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.▪ Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">▪ Move person to fresh air.▪ If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.▪ Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

[See inside booklet for [First Aid], Restrictions and Precautionary Statements]

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-7
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

NOTIFICATION

SEP 05 2013

Arboriculture in Motion®

Arbor-OTC is a [registered] trademark of Arborjet Inc.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

This product contains the antibiotic oxytetracycline. To reduce the development of drug-resistant bacteria and maintain the effectiveness of this and other antibacterial products, this product should be used only to treat or prevent infections that are proven or strongly suspected to be caused by bacteria.

This material is not to be used for medical or veterinary purposes.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application in Palm Trees

Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline) in Palms using the Arborjet Injection System

Apply to Palms 3-4 times annually for continuous protection from Phytoplasma Disease. For suppression of symptoms in a symptomatic palm use up to 3 times the amounts described in the table under Application Instructions. Once symptoms subside return to a preventative dosing schedule.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate Number of Palms Treated
140 g (5.0 oz.)	1250 mls	1320 mls	50
28g (1.0 oz.)	250 mls	264 mls	10
5.6g (0.2 oz.)	50 mls	52.8 mls	2
2.8g (0.1 oz.)	25 mls	26.4 mls	1

1. Determine total number of doses desired for project or container size.
2. Add quantity of ARBOR-OTC from [step one] or [first column] into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 10 palms.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Application Instructions: Due to the nature of the Palm's vascular system only one injection site is needed per palm per application.

Small Palm	Average Palm	Large Palm
< 6' Clear Trunk	6' – 15' Clear Trunk	> 15' Clear Trunk
16 mls of Solution	~26 mls of Solution	35 mls of Solution

Trunk diameter should be taken into consideration. A small trunk diameter can reduce by one category the dose required and a large trunk diameter can increase by one category the dose required

Treating Palms

Inject into the trunk into lignified (hardened, woody) tissues typically within 2-3 ft. of the soil. Drill into the stem 4" as instructed below. Inject through the Arborplug. Only one injection site is needed.

Using the STINGER Tip for Palms

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfest needles between trees.

Using Arborplugs™ for Palms

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug using the set tool and hammer. Inject by Inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Additional Injections in a Single Palm:

Additional injections can use the same hole as long as new tissue is accessed deeper in the hole. For additional injections:

Arborplug

Remove the plug and use a 3/16 drill bit and drill 1/2 inch deeper.

Drill the Arborplug hole 1/2 inch deeper and replace it with a new Arborplug*.

Inject Prescribed dose as instructed above using Arborplug.

Stinger

Use 3/16 inch drill to drill hole 1/2 inch deeper

Inject prescribed dose as outlined above for Stinger Tip

*Note: If you originally used the # 3 Arborplug, for re-treatment we recommend replacing with a # 4 Arborplug to more easily make the application using the original injection site.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool (<77°F, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer for recycling if available. If not, discard in sanitary landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

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To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

ARBORJET, INC. and Seller offer this product, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of ARBORJET, INC.

**Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801**

This label may contain some or all of the following statements. ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Phytoplasma Disease
Palms

ARBOR-OTC

[Sub-label 2: Label for use in all other trees except Palm]

[Injectable Tree Antibiotic]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing trees including Bacterial Leaf Scorch and Fire Blight

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none">Hold eye open and rinse slowly and gently with water for 15-20 minutes.Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">Move person to fresh air.If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

[See inside booklet for [First Aid], Restrictions and Precautionary Statements]

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-7
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

Arboriculture in Motion®
Arbor-OTC is a [registered] trademark of Arborjet Inc.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

This product contains the antibiotic oxytetracycline. To reduce the development of drug-resistant bacteria and maintain the effectiveness of this and other antibacterial products, this product should be used only to treat or prevent infections that are proven or strongly suspected to be caused by bacteria.

This material is not to be used for medical or veterinary purposes.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application Method

For treatment of Bacterial Leaf Scorch, Fire Blight and Ash Yellows using the Arborjet Injection System

Apply once per growing season in spring after leaves have fully developed. Scorch symptoms are suppressed only during the growing season in which treatment is administered. Re-treatment is required during each growing season for continued suppression.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate DBH inches of Tree Treated
140g (5.0 oz.)	1250 mls	1320 mls	500 inches
28g (1.0 oz.)	250 mls	264 mls	100 inches
2.8g (0.1 oz.)	25 mls	26.4 mls	10 inches
1.4g (0.05 oz.)	12.5 mls	13.2 mls	5 inches

1. Measure the tree diameter at breast height (DBH) to determine the dose that is needed.
2. Add quantity of ARBOR-OTC from [step one] or [first column] into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 100 DBH inches of trees.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Injection into Trees:

To determine the application/dose rate per tree:

- 1) Measure the tree diameter in inches at chest height (4½ feet from ground) to find the Diameter at Breast Height (DBH). (If measuring tree circumference, divide circumference by 3 to obtain the DBH in inches.)
- 2) Calculate the number of injection sites by dividing the DBH in inches by 2.
- 3) Divide the total dose by the number of injection sites to determine required dosage per injection site.

Example: For a tree with a DBH of 10 inches (or circumference of 30 inches):

- 1) DBH = 10" (circumference 30" ÷ 3 = 10").
- 2) Divide DBH of 10" by 2 = 5 injection sites.
- 3) Divide 26.4 mL by 5 injection sites = 5.28 mL per injection site.

Using the STINGER Tip

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfect needles between trees.

Using Arborplugs™

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug, countersink to the thickness of the bark using the set tool and hammer. Inject by Inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Future Injections in the Same Tree:

Future injections in the same tree are applied into new holes placed intermediate to the old injection sites. Drill new sites either above or below (by 2" vertically) to the old sites and 2 to 3" horizontally from them. Applied correctly, this will form a triangular pattern with the old sites.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool (<77°F, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer for recycling if available. If not, discard in sanitary landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Notice: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Tree injury, ineffectiveness or other unintended consequence may result because of such factors as manner of use or application, weather or tree conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ARBORJET, INC. or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ARBORJET, INC. and Seller harmless for any claims relating to such factors.

ARBORJET, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions. This warranty does not extend to the use of the product contrary to label instructions, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARBORJET, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

ARBORJET, INC. and Seller offer this product, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of ARBORJET, INC.

**Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801**

This label may contain some or all of the following statements.

ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Ash Yellows	Cotoneaster	Witches' Broom (caused by mycoplasma-like organisms)
Ash	Crabapple	Apple
Bacterial blast	Creambush	Ash
Apple	Firethorn	Dogwood
Pear	Flowering Quince	Elm
Bacterial Blight	Hawthorn	Lilac
Flowering Crabapple	Indian Hawthorn	Locust
Hawthorn	Loquat	Peach
Lilac	Mountain Ash	Sassafras
Walnut	Ninebark	X-Disease
Bacterial Canker	Pear	Cherry
Hickory	Pearlbush	Chokecherry
Horsechestnut	Photinia	Nectarine
Maple	Plum	Peach
Mimosa	Quince	Plum
Oak	Rose	
Persian Walnut	Serviceberry	
Walnut	Fruit Spot	
Bacterial Leaf Scorch	Avocado	
Elm	Leaf and Shoot Blight	
Gum	Mock Orange	
Oak	Leaf Blight and Brown Rot	
Oleander	Mandarin Orange	
Sycamore	Leaf Spot	
Blossom Blast	Basswood	
Citrus	Hibiscus	
Grapefruit	Magnolia	
Lime	Lethal Decline	
Tea rose	Basswood	
Walnut	Hibiscus	
Blossom Blight and Canker	Magnolia	
Almond	Phloem Necrosis	
Apricot	Elm	
Cherry	Stem Canker	
Peach	Poplar	
Pear	Stubborn Disease	
Plum	Citrus	
Bunch Disease	Tip Dieback	
Butternut	Maple	
Pecan	Vascular Yellows	
Walnut	Ash	
Crown Gall	Elm	
Flowering Quince	Wetwood / Slime Flux	
Quince	Apple	
Decline	Cherry	
Peach	Elm	
Pear	Hickory	
Nectarine	Maple	
Fire Blight	Oak	
Apple	Peach	
Apricot	Pear	
Cherry	Plum	
Chokecherry	Poplar	
Cliff rose	Walnut	

ARBOR-OTC

[Sub-label 1: Palm Tree Use]

[Injectable Tree Antibiotic]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing palms including Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline).

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none"> Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

[See inside booklet for [First Aid], Restrictions and Precautionary Statements]

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-7
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

Arboriculture in Motion®
Arbor-OTC is a [registered] trademark of Arborjet Inc.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

This product contains the antibiotic oxytetracycline. To reduce the development of drug-resistant bacteria and maintain the effectiveness of this and other antibacterial products, this product should be used only to treat or prevent infections that are proven or strongly suspected to be caused by bacteria.

This material is not to be used for medical or veterinary purposes.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application in Palm Trees

Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline) in Palms using the Arborjet Injection System

Apply to Palms 3-4 times annually for continuous protection from Phytoplasma Disease. For suppression of symptoms in a symptomatic palm use up to 3 times the amounts described in the table under Application Instructions. Once symptoms subside return to a preventative dosing schedule.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate Number of Palms Treated
140 g (5.0 oz.)	1250 mls	1320 mls	50
28g (1.0 oz.)	250 mls	264 mls	10
5.6g (0.2 oz.)	50 mls	52.8 mls	2
2.8g (0.1 oz.)	25 mls	26.4 mls	1

1. Determine total number of doses desired for project or container size.
2. Add quantity of ARBOR-OTC from [step one] or [first column] into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 10 palms.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Application Instructions: Due to the nature of the Palm's vascular system only one injection site is needed per palm per application.

Small Palm	Average Palm	Large Palm
< 6' Clear Trunk	6' – 15' Clear Trunk	> 15' Clear Trunk
16 mls of Solution	~26 mls of Solution	35 mls of Solution

Trunk diameter should be taken into consideration. A small trunk diameter can reduce by one category the dose required and a large trunk diameter can increase by one category the dose required

Treating Palms

Inject into the trunk into lignified (hardened, woody) tissues typically within 2-3 ft. of the soil. Drill into the stem 4" as instructed below. Inject through the Arborplug. Only one injection site is needed.

Using the STINGER Tip for Palms

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfest needles between trees.

Using Arborplugs™ for Palms

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug using the set tool and hammer. Inject by Inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Additional Injections in a Single Palm:

Additional injections can use the same hole as long as new tissue is accessed deeper in the hole. For additional injections:

Arborplug

Remove the plug and use a 3/16 drill bit and drill 1/2 inch deeper.

Drill the Arborplug hole 1/2 inch deeper and replace it with a new Arborplug*.

Inject Prescribed dose as instructed above using Arborplug.

Stinger

Use 3/16 inch drill to drill hole 1/2 inch deeper

Inject prescribed dose as outlined above for Stinger Tip

*Note: If you originally used the # 3 Arborplug, for re-treatment we recommend replacing with a # 4 Arborplug to more easily make the application using the original injection site.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool (<77°F, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer for recycling if available. If not, discard in sanitary landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Notice: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Tree injury, ineffectiveness or other unintended consequence may result because of such factors as manner of use or application, weather or tree conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ARBORJET, INC., or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ARBORJET, INC. and Seller harmless for any claims relating to such factors.

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To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

ARBORJET, INC. and Seller offer this product, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of ARBORJET, INC.

**Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801**

This label may contain some or all of the following statements. ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Phytoplasma Disease
Palms

ARBOR-OTC

[Sub-label 2: Label for use in all other trees except Palm]

[Injectable Tree Antibiotic]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing trees including Bacterial Leaf Scorch and Fire Blight

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none">▪ Hold eye open and rinse slowly and gently with water for 15-20 minutes.▪ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.▪ Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">▪ Move person to fresh air.▪ If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.▪ Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

[See inside booklet for [First Aid], Restrictions and Precautionary Statements]

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-7
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

Arboriculture in Motion®
Arbor-OTC is a [registered] trademark of Arborjet Inc.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

This product contains the antibiotic oxytetracycline. To reduce the development of drug-resistant bacteria and maintain the effectiveness of this and other antibacterial products, this product should be used only to treat or prevent infections that are proven or strongly suspected to be caused by bacteria.

This material is not to be used for medical or veterinary purposes.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application Method

For treatment of Bacterial Leaf Scorch, Fire Blight and Ash Yellows using the Arborjet Injection System

Apply once per growing season in spring after leaves have fully developed. Scorch symptoms are suppressed only during the growing season in which treatment is administered. Re-treatment is required during each growing season for continued suppression.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate DBH inches of Tree Treated
140g (5.0 oz.)	1250 mls	1320 mls	500 inches
28g (1.0 oz.)	250 mls	264 mls	100 inches
2.8g (0.1 oz.)	25 mls	26.4 mls	10 inches
1.4g (0.05 oz.)	12.5 mls	13.2 mls	5 inches

1. Measure the tree diameter at breast height (DBH) to determine the dose that is needed.
2. Add quantity of ARBOR-OTC from [step one] or [first column] into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 100 DBH inches of trees.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Injection into Trees:

To determine the application/dose rate per tree:

- 1) Measure the tree diameter in inches at chest height (4½ feet from ground) to find the Diameter at Breast Height (DBH). (If measuring tree circumference, divide circumference by 3 to obtain the DBH in inches.)
- 2) Calculate the number of injection sites by dividing the DBH in inches by 2.
- 3) Divide the total dose by the number of injection sites to determine required dosage per injection site.

Example: For a tree with a DBH of 10 inches (or circumference of 30 inches):

- 1) $DBH = 10''$ (circumference $30'' \div 3 = 10''$).
- 2) Divide DBH of 10'' by 2 = 5 injection sites.
- 3) Divide 26.4 mL by 5 injection sites = 5.28 mL per injection site.

Using the STINGER Tip

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfect needles between trees.

Using Arborplugs™

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug, countersink to the thickness of the bark using the set tool and hammer. Inject by Inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Future Injections in the Same Tree:

Future injections in the same tree are applied into new holes placed intermediate to the old injection sites. Drill new sites either above or below (by 2" vertically) to the old sites and 2 to 3" horizontally from them. Applied correctly, this will form a triangular pattern with the old sites.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool (<77°F, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer for recycling if available. If not, discard in sanitary landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

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To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

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**Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801**

This label may contain some or all of the following statements.

ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Ash Yellows	Cotoneaster	Witches' Broom (caused by mycoplasma-like organisms)
Ash	Crabapple	Apple
Bacterial blast	Creambush	Ash
Apple	Firethorn	Dogwood
Pear	Flowering Quince	Elm
Bacterial Blight	Hawthorn	Lilac
Flowering Crabapple	Indian Hawthorn	Locust
Hawthorn	Loquat	Peach
Lilac	Mountain Ash	Sassafras
Walnut	Ninebark	X-Disease
Bacterial Canker	Pear	Cherry
Hickory	Pearlbush	Chokecherry
Horsechestnut	Photinia	Nectarine
Maple	Plum	Peach
Mimosa	Quince	Plum
Oak	Rose	
Persian Walnut	Serviceberry	
Walnut	Fruit Spot	
Bacterial Leaf Scorch	Avocado	
Elm	Leaf and Shoot Blight	
Gum	Mock Orange	
Oak	Leaf Blight and Brown Rot	
Oleander	Mandarin Orange	
Sycamore	Leaf Spot	
Blossom Blast	Basswood	
Citrus	Hibiscus	
Grapefruit	Magnolia	
Lime	Lethal Decline	
Tea rose	Basswood	
Walnut	Hibiscus	
Blossom Blight and Canker	Magnolia	
Almond	Phloem Necrosis	
Apricot	Elm	
Cherry	Stem Canker	
Peach	Poplar	
Pear	Stubborn Disease	
Plum	Citrus	
Bunch Disease	Tip Dieback	
Butternut	Maple	
Pecan	Vascular Yellows	
Walnut	Ash	
Crown Gall	Elm	
Flowering Quince	Wetwood / Slime Flux	
Quince	Apple	
Decline	Cherry	
Peach	Elm	
Pear	Hickory	
Nectarine	Maple	
Fire Blight	Oak	
Apple	Peach	
Apricot	Pear	
Cherry	Plum	
Chokecherry	Poplar	
Cliff rose	Walnut	

Hill, Shaunta

From: Hill, Shaunta
Sent: Thursday, August 08, 2013 1:39 PM
To: 'sstracquatano@delta-ac.com'
Subject: 74578-7 Decision # 481060: Notification request - corrections needed
Attachments: Naming e-labels.pdf

Hello Susan,

Before we can complete your notification request, I would appreciate your inclusion of the following label revision.

On pages 1 and 6, replace "Injectable Antibiotic" with "Injectable Agriculture Antibiotic".

Once you have incorporated this change, please refer to the attached guidance document for naming the electronic label file. Please note that you should include the current date and periods as specified. You may send the revised label by email directly to me. If you have any questions, please let me know.

Thank you.

Regards,

Shaunta Hill, Ph. D
U.S. EPA :Office of Chemical Safety and Pollution Prevention
Registration Division/Fungicide Branch
1200 Pennsylvania Avenue, NW (7504P)
Washington, DC 20460

Tel: 703.347.8961 | Fax: 703.305.6920
E-mail: hill.shaunta@epa.gov
URL Address: www.epa.gov/pesticides

ARBOR-OTC

[Sub-label 1: Palm Tree Use]

[Injectable Antibiotic]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing palms including Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline).

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none">▪ Hold eye open and rinse slowly and gently with water for 15-20 minutes.▪ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.▪ Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">▪ Move person to fresh air.▪ If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.▪ Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

[See inside booklet for [First Aid], Restrictions and Precautionary Statements]

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-7
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

Arboriculture in Motion®
Arbor-OTC is a [registered] trademark of Arborjet Inc.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

This product contains the antibiotic oxytetracycline. To reduce the development of drug-resistant bacteria and maintain the effectiveness of this and other antibacterial products, this product should be used only to treat or prevent infections that are proven or strongly suspected to be caused by bacteria.

This material is not to be used for medical or veterinary purposes.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application in Palm Trees

Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline) in Palms using the Arborjet Injection System

Apply to Palms 3-4 times annually for continuous protection from Phytoplasma Disease. For suppression of symptoms in a symptomatic palm use up to 3 times the amounts described in the table under Application Instructions. Once symptoms subside return to a preventative dosing schedule.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate Number of Palms Treated
140 g (5.0 oz.)	1250 mls	1320 mls	50
28g (1.0 oz.)	250 mls	264 mls	10
5.6g (0.2 oz.)	50 mls	52.8 mls	2
2.8g (0.1 oz.)	25 mls	26.4 mls	1

1. Determine total number of doses desired for project or container size.
2. Add quantity of ARBOR-OTC from [step one] or [first column] into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 10 palms.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Application Instructions: Due to the nature of the Palm's vascular system only one injection site is needed per palm per application.

Small Palm	Average Palm	Large Palm
< 6' Clear Trunk	6' – 15' Clear Trunk	> 15' Clear Trunk
16 mls of Solution	~26 mls of Solution	35 mls of Solution

Trunk diameter should be taken into consideration. A small trunk diameter can reduce by one category the dose required and a large trunk diameter can increase by one category the dose required

Treating Palms

Inject into the trunk into lignified (hardened, woody) tissues typically within 2-3 ft. of the soil. Drill into the stem 4" as instructed below. Inject through the Arborplug. Only one injection site is needed.

Using the STINGER Tip for Palms

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfest needles between trees.

Using Arborplugs™ for Palms

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug using the set tool and hammer. Inject by Inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Additional Injections in a Single Palm:

Additional injections can use the same hole as long as new tissue is accessed deeper in the hole. For additional injections:

Arborplug

Remove the plug and use a 3/16 drill bit and drill 1/2 inch deeper.

Drill the Arborplug hole 1/2 inch deeper and replace it with a new Arborplug*.

Inject Prescribed dose as instructed above using Arborplug.

Stinger

Use 3/16 inch drill to drill hole 1/2 inch deeper

Inject prescribed dose as outlined above for Stinger Tip

*Note: If you originally used the # 3 Arborplug, for re-treatment we recommend replacing with a # 4 Arborplug to more easily make the application using the original injection site.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool (<77°F, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer for recycling if available. If not, discard in sanitary landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Notice: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Tree injury, ineffectiveness or other unintended consequence may result because of such factors as manner of use or application, weather or tree conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ARBORJET, INC., or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ARBORJET, INC. and Seller harmless for any claims relating to such factors.

ARBORJET, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions. This warranty does not extend to the use of the product contrary to label instructions, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARBORJET, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

ARBORJET, INC. and Seller offer this product, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of ARBORJET, INC.

**Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801**

This label may contain some or all of the following statements. ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Phytoplasma Disease
Palms

ARBOR-OTC

[Sub-label 2: Label for use in all other trees except Palm]

[Injectable Antibiotic]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing trees including Bacterial Leaf Scorch and Fire Blight

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none">▪ Hold eye open and rinse slowly and gently with water for 15-20 minutes.▪ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.▪ Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">▪ Move person to fresh air.▪ If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.▪ Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

[See inside booklet for [First Aid], Restrictions and Precautionary Statements]

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-7
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

Arboriculture in Motion®
Arbor-OTC is a [registered] trademark of Arborjet Inc.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

This product contains the antibiotic oxytetracycline. To reduce the development of drug-resistant bacteria and maintain the effectiveness of this and other antibacterial products, this product should be used only to treat or prevent infections that are proven or strongly suspected to be caused by bacteria.

This material is not to be used for medical or veterinary purposes.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application Method

For treatment of Bacterial Leaf Scorch, Fire Blight and Ash Yellows using the Arborjet Injection System

Apply once per growing season in spring after leaves have fully developed. Scorch symptoms are suppressed only during the growing season in which treatment is administered. Re-treatment is required during each growing season for continued suppression.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate DBH inches of Tree Treated
140g (5.0 oz.)	1250 mls	1320 mls	500 inches
28g (1.0 oz.)	250 mls	264 mls	100 inches
2.8g (0.1 oz.)	25 mls	26.4 mls	10 inches
1.4g (0.05 oz.)	12.5 mls	13.2 mls	5 inches

1. Measure the tree diameter at breast height (DBH) to determine the dose that is needed.
2. Add quantity of ARBOR-OTC from [step one] or [first column] into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 100 DBH inches of trees.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Injection into Trees:

To determine the application/dose rate per tree:

- 1) Measure the tree diameter in inches at chest height (4½ feet from ground) to find the Diameter at Breast Height (DBH). (If measuring tree circumference, divide circumference by 3 to obtain the DBH in inches.)
- 2) Calculate the number of injection sites by dividing the DBH in inches by 2.
- 3) Divide the total dose by the number of injection sites to determine required dosage per injection site.

Example: For a tree with a DBH of 10 inches (or circumference of 30 inches):

- 1) $DBH = 10''$ (circumference $30'' \div 3 = 10''$).
- 2) Divide DBH of 10'' by 2 = 5 injection sites.
- 3) Divide 26.4 mL by 5 injection sites = 5.28 mL per injection site.

Using the STINGER Tip

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfest needles between trees.

Using Arborplugs™

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug, countersink to the thickness of the bark using the set tool and hammer. Inject by inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Future Injections in the Same Tree:

Future injections in the same tree are applied into new holes placed intermediate to the old injection sites. Drill new sites either above or below (by 2" vertically) to the old sites and 2 to 3" horizontally from them. Applied correctly, this will form a triangular pattern with the old sites.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool (<77°F, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer for recycling if available. If not, discard in sanitary landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Notice: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Tree injury, ineffectiveness or other unintended consequence may result because of such factors as manner of use or application, weather or tree conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ARBORJET, INC. or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ARBORJET, INC. and Seller harmless for any claims relating to such factors.

ARBORJET, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions. This warranty does not extend to the use of the product contrary to label instructions, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARBORJET, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

ARBORJET, INC. and Seller offer this product, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of ARBORJET, INC

**Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801**

This label may contain some or all of the following statements.

ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Ash Yellows	Cotoneaster	Witches' Broom (caused by mycoplasma-like organisms)
Ash	Crabapple	Apple
Bacterial blast	Creambush	Ash
Apple	Firethorn	Dogwood
Pear	Flowering Quince	Elm
Bacterial Blight	Hawthorn	Lilac
Flowering Crabapple	Indian Hawthorn	Locust
Hawthorn	Loquat	Peach
Lilac	Mountain Ash	Sassafras
Walnut	Ninebark	X-Disease
Bacterial Canker	Pear	Cherry
Hickory	Pearlbush	Chokecherry
Horsechestnut	Photinia	Nectarine
Maple	Plum	Peach
Mimosa	Quince	Plum
Oak	Rose	
Persian Walnut	Serviceberry	
Walnut	Fruit Spot	
Bacterial Leaf Scorch	Avocado	
Elm	Leaf and Shoot Blight	
Gum	Mock Orange	
Oak	Leaf Blight and Brown Rot	
Oleander	Mandarin Orange	
Sycamore	Leaf Spot	
Blossom Blast	Basswood	
Citrus	Hibiscus	
Grapefruit	Magnolia	
Lime	Lethal Decline	
Tea rose	Basswood	
Walnut	Hibiscus	
Blossom Blight and Canker	Magnolia	
Almond	Phloem Necrosis	
Apricot	Elm	
Cherry	Stem Canker	
Peach	Poplar	
Pear	Stubborn Disease	
Plum	Citrus	
Bunch Disease	Tip Dieback	
Butternut	Maple	
Pecan	Vascular Yellows	
Walnut	Ash	
Crown Gall	Elm	
Flowering Quince	Wetwood / Slime Flux	
Quince	Apple	
Decline	Cherry	
Peach	Elm	
Pear	Hickory	
Nectarine	Maple	
Fire Blight	Oak	
Apple	Peach	
Apricot	Pear	
Cherry	Plum	
Chokecherry	Poplar	
Cliff rose	Walnut	

Hill, Shaunta

From: Yanchulis, Michael
Sent: Monday, July 22, 2013 12:01 PM
To: Schaible, Stephen; Hill, Shaunta; Benmhend, Driss
Cc: ssracquatanio@delta-ac.com
Subject: RE: replacement labels
Attachments: ARBOR-OTC highlighted Label rev071213.pdf; ARBOR-OTC clean Label rev071213.pdf

Please see the attachments which are associated with the notification with decision number D-481060. The EPA number is missing the last part of the number and the submitter wants to replace the labels submitted with the attached.

Mick Yanchulis
Information Services Branch
Office of Pesticide Programs

From: Schaible, Stephen
Sent: Friday, July 12, 2013 5:42 PM
To: Yanchulis, Michael
Cc: ssracquatanio@delta-ac.com
Subject: FW: replacement labels

Mick,

Is this something you can easily do, or should I forward this to the PM?

Steve

Stephen A. Schaible, PRIA Ombudsman
Registration Division (7505P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
ph: (703)308-9362
fax: (703)305-6920

From: Susan Stracquatanio [mailto:]
Sent: Friday, July 12, 2013 2:02 PM
To: Schaible, Stephen; Yanchulis, Michael
Subject: replacement labels

Re: Arbor-OTC, EPA Reg. No. 74578-7

Steve / Mick,

We have gotten emails re new submissions from both of you in the past so I am wondering if either of you can help me. A label notification submission was sent to the mailroom today from Delta Analytical for Arborjet, Inc. In looking at the submission, I see that the EPA number is missing the last part of the number. Would you kindly replace the labels submitted with the attached? Thanks so much for your help.

Best regards,
Susan Stracquatanio
ssracquatanio@delta-ac.com

Delta Analytical Corporation
12510 Prosperity Dr., Ste 160
Silver Spring, MD 20904
301 680-7971
301 680-7975 fax

Receipt for Section 3

S: Resubmission: ☐ Yes ☒ No

Regulatory Type: Fee For Service: ☐ Yes ☒ No

Application Type:

Company: ☒ V

Risk Manager:

Product #: Product Name:

Overrides:

Me Too Section3: Me Too Product Name:

Application Date: ☒ icl OPP Rec'd Date: ☒ icl

Front End Date: ☒ icl Risk Manager Send Date: ☒ icl

FFS Due Date: Negotiated Due Date:

OPP Target Date:

Fast Track: ☐ New Ingredient: ☐

Receipt Description:

Form A: ☐ Signature Date: Form B: ☐ Signature Date:

New Ingredient Request Date:

New Ingredient Received Date:

Print Letter

Enter More Information

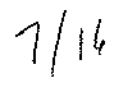
Tracking

Receipt Content

Paper Label


ViewEdit

Product ingredient source information may be entitled to confidential treatment



15 musical staves with various notations, including notes, rests, and bar lines. The notation is in a historical style, possibly from a 16th-century manuscript.

57

United States Environmental Protection Agency Washington, DC 20460		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number NOTIF
Application for Pesticide - Section I			
1. Company/Product Number 74578-7		2. EPA Product Manager: Marcel Howard	
4. Company/Product Name Arbor-OTC		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include Zip Code) Arborjet, Inc. c/o Delta Analytical Corporation 12510 Prosperity Drive, Suite 160 Silver Spring, MD 20904 <input type="checkbox"/> Check if this is new address		6. Expedited Review. In accordance with FIFRA Sec. (3)(c)(3)(b)(i), my product is similar or identical in composition and labeling to:	
Section II			
<input type="checkbox"/> Amendment - Explain below <input type="checkbox"/> Resubmission in response to Agency letter dated: <input checked="" type="checkbox"/> Notification		<input type="checkbox"/> Final printed labels in response to Agency letter dated: <input type="checkbox"/> "MeToo" Application <input type="checkbox"/> Other - Explain Below	
Explanation: Use additional page(s) if necessary. (For sections I and II.) Notification under PR Notice 98-10 to make minor label revisions This notification is consistent with the provisions of pr notice 98-10 and EPA regulations at 40 cfr 152.46 and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.			
Section III			
1. Material This Product Will Be Packaged In :			
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Unit packaging weight No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, package weight No. per container	2. Type of container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other: (Specify)
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) of Retail Container: 0.1 oz. / 2.8 g; 0.2 oz. / 5.6 g; 1.0 oz. / 28 g; 5.0 oz. / 140 g		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in which Label is affixed to product: <input type="checkbox"/> Lithograph <input type="checkbox"/> Stenciled <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Other			
Section IV			
1. Contact Point			
Name Jeff Jones		Title: Agent, Arborjet, Inc.	
		Telephone No.: 301 680-7971	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			Date Application Received (Stamped)
2. Signature 		3. Title: Agent, Arborjet, Inc.	
4. Typed Name Jeff Jones		5. Date July 11, 2013	

ARBOR-OTC

[Sub-label 1: Palm Tree Use]

[Injectable Antibiotic]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing palms including Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline).

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none">▪ Hold eye open and rinse slowly and gently with water for 15-20 minutes.▪ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.▪ Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">▪ Move person to fresh air.▪ If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.▪ Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

[See inside booklet for [First Aid], Restrictions and Precautionary Statements]

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

Arborculture In Motion®
Arbor-OTC is a [registered] trademark of Arborjet Inc.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

This product contains the antibiotic oxytetracycline. To reduce the development of drug-resistant bacteria and maintain the effectiveness of this and other antibacterial products, this product should be used only to treat or prevent infections that are proven or strongly suspected to be caused by bacteria.

This material is not to be used for medical or veterinary purposes.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application in Palm Trees

Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline) in Palms using the Arborjet Injection System

Apply to Palms 3-4 times annually for continuous protection from Phytoplasma Disease. For suppression of symptoms in a symptomatic palm use up to 3 times the amounts described in the table under Application Instructions. Once symptoms subside return to a preventative dosing schedule.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate Number of Palms Treated
140 g (5.0 oz.)	1250 mls	1320 mls	50
28g (1.0 oz.)	250 mls	264 mls	10
5.6g (0.2 oz.)	50 mls	52.8 mls	2
2.8g (0.1 oz.)	25 mls	26.4 mls	1

1. Determine total number of doses desired for project or container size.
2. Add quantity of ARBOR-OTC from [step one] or [first column] into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 10 palms.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Application Instructions: Due to the nature of the Palm's vascular system only one injection site is needed per palm per application.

Small Palm	Average Palm	Large Palm
< 6' Clear Trunk	6' – 15' Clear Trunk	> 15' Clear Trunk
16 mls of Solution	~26 mls of Solution	35 mls of Solution

Trunk diameter should be taken into consideration. A small trunk diameter can reduce by one category the dose required and a large trunk diameter can increase by one category the dose required.

Treating Palms

Inject into the trunk into lignified (hardened, woody) tissues typically within 2-3 ft. of the soil. Drill into the stem 4" as instructed below. Inject through the Arborplug. Only one injection site is needed.

Using the STINGER Tip for Palms

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfect needles between trees.

Using Arborplugs™ for Palms

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug using the set tool and hammer. Inject by Inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Additional Injections in a Single Palm:

Additional injections can use the same hole as long as new tissue is accessed deeper in the hole. For additional injections:

Arborplug

Remove the plug and use a 3/16 drill bit and drill 1/2 inch deeper.

Drill the Arborplug hole 1/2 inch deeper and replace it with a new Arborplug*.

Inject Prescribed dose as instructed above using Arborplug.

Stinger

Use 3/16 inch drill to drill hole 1/2 inch deeper

Inject prescribed dose as outlined above for Stinger Tip

*Note: If you originally used the # 3 Arborplug, for re-treatment we recommend replacing with a # 4 Arborplug to more easily make the application using the original injection site.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool (<77°F, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer for recycling if available. If not, discard in sanitary landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Notice: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Tree injury, ineffectiveness or other unintended consequence may result because of such factors as manner of use or application, weather or tree conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ARBORJET, INC., or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ARBORJET, INC. and Seller harmless for any claims relating to such factors.

ARBORJET, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions. This warranty does not extend to the use of the product contrary to label instructions, and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARBORJET, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.

ARBORJET, INC. and Seller offer this product, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of ARBORJET, INC.

**Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801**

This label may contain some or all of the following statements. ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Phytoplasma Disease
Palms

ARBOR-OTC

[Sub-label 2: Label for use in all other trees except Palm]

[Injectable Antibiotic]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing trees including Bacterial Leaf Scorch and Fire Blight

Active Ingredient:

Oxytetracycline Hydrochloride*	59.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none">▪ Hold eye open and rinse slowly and gently with water for 15-20 minutes.▪ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.▪ Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">▪ Move person to fresh air.▪ If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.▪ Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

[See inside booklet for [First Aid], Restrictions and Precautionary Statements]

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

Arborculture In Motion®
Arbor-OTC is a [registered] trademark of Arborjet Inc.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

This product contains the antibiotic oxytetracycline. To reduce the development of drug-resistant bacteria and maintain the effectiveness of this and other antibacterial products, this product should be used only to treat or prevent infections that are proven or strongly suspected to be caused by bacteria.

This material is not to be used for medical or veterinary purposes.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application Method

For treatment of Bacterial Leaf Scorch, Fire Blight and Ash Yellows using the Arborjet Injection System

Apply once per growing season in spring after leaves have fully developed. Scorch symptoms are suppressed only during the growing season in which treatment is administered. Re-treatment is required during each growing season for continued suppression.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate DBH inches of Tree Treated
140g (5.0 oz.)	1250 mls	1320 mls	500 inches
28g (1.0 oz.)	250 mls	264 mls	100 inches
2.8g (0.1 oz.)	25 mls	26.4 mls	10 inches
1.4g (0.05 oz.)	12.5 mls	13.2 mls	5 inches

1. Measure the tree diameter at breast height (DBH) to determine the dose that is needed.
2. Add quantity of ARBOR-OTC from [step one] or [first column] into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 100 DBH inches of trees.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Injection into Trees:

To determine the application/dose rate per tree:

- 1) Measure the tree diameter in inches at chest height (4½ feet from ground) to find the Diameter at Breast Height (DBH). (If measuring tree circumference, divide circumference by 3 to obtain the DBH in inches.)
- 2) Calculate the number of injection sites by dividing the DBH in inches by 2.
- 3) Divide the total dose by the number of injection sites to determine required dosage per injection site.

Example: For a tree with a DBH of 10 inches (or circumference of 30 inches):

- 1) DBH = 10" (circumference 30" ÷ 3 = 10").
- 2) Divide DBH of 10" by 2 = 5 injection sites.
- 3) Divide 26.4 mL by 5 injection sites = 5.28 mL per injection site.

Using the STINGER Tip

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfect needles between trees.

Using Arborplugs™

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug, countersink to the thickness of the bark using the set tool and hammer. Inject by Inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Future Injections in the Same Tree:

Future injections in the same tree are applied into new holes placed intermediate to the old injection sites. Drill new sites either above or below (by 2" vertically) to the old sites and 2 to 3" horizontally from them. Applied correctly, this will form a triangular pattern with the old sites.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool (<77°F, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer for recycling if available. If not, discard in sanitary landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Notice: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Tree injury, ineffectiveness or other unintended consequence may result because of such factors as manner of use or application, weather or tree conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ARBORJET, INC. or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ARBORJET, INC. and Seller harmless for any claims relating to such factors.

ARBORJET, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions. This warranty does not extend to the use of the product contrary to label instructions, and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARBORJET, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.

ARBORJET, INC. and Seller offer this product, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of ARBORJET, INC.

**Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801**

This label may contain some or all of the following statements.

ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Ash Yellows	Cotoneaster	Witches' Broom (caused by mycoplasma-like organisms)
Ash	Crabapple	Apple
Bacterial blast	Creambush	Ash
Apple	Firethorn	Dogwood
Pear	Flowering Quince	Elm
Bacterial Blight	Hawthorn	Lilac
Flowering Crabapple	Indian Hawthorn	Locust
Hawthorn	Loquat	Peach
Lilac	Mountain Ash	Sassafras
Walnut	Ninebark	X-Disease
Bacterial Canker	Pear	Cherry
Hickory	Pearlbush	Chokecherry
Horsechestnut	Photinia	Nectarine
Maple	Plum	Peach
Mimosa	Quince	Plum
Oak	Rose	
Persian Walnut	Serviceberry	
Walnut	Fruit Spot	
Bacterial Leaf Scorch	Avocado	
Elm	Leaf and Shoot Blight	
Gum	Mock Orange	
Oak	Leaf Blight and Brown Rot	
Oleander	Mandarin Orange	
Sycamore	Leaf Spot	
Blossom Blast	Basswood	
Citrus	Hibiscus	
Grapefruit	Magnolia	
Lime	Lethal Decline	
Tea rose	Basswood	
Walnut	Hibiscus	
Blossom Blight and Canker	Magnolia	
Almond	Phloem Necrosis	
Apricot	Elm	
Cherry	Stem Canker	
Peach	Poplar	
Pear	Stubborn Disease	
Plum	Citrus	
Bunch Disease	Tip Dieback	
Butternut	Maple	
Pecan	Vascular Yellows	
Walnut	Ash	
Crown Gall	Elm	
Flowering Quince	Wetwood / Slime Flux	
Quince	Apple	
Decline	Cherry	
Peach	Elm	
Pear	Hickory	
Nectarine	Maple	
Fire Blight	Oak	
Apple	Peach	
Apricot	Pear	
Cherry	Plum	
Chokecherry	Poplar	
Cliff rose	Walnut	

ARBOR-OTC

[Sub-label 1: Palm Tree Use]

[Injectable Antibiotic]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing palms including Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline).

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none">▪ Hold eye open and rinse slowly and gently with water for 15-20 minutes.▪ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.▪ Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">▪ Move person to fresh air.▪ If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.▪ Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

[See inside booklet for [First Aid], Restrictions and Precautionary Statements]

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

Arborculture In Motion®

Arbor-OTC is a [registered] trademark of Arborjet Inc.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

This product contains the antibiotic oxytetracycline. To reduce the development of drug-resistant bacteria and maintain the effectiveness of this and other antibacterial products, this product should be used only to treat or prevent infections that are proven or strongly suspected to be caused by bacteria.

This material is not to be used for medical or veterinary purposes.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application in Palm Trees

Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline) in Palms using the Arborjet Injection System

Apply to Palms 3-4 times annually for continuous protection from Phytoplasma Disease. For suppression of symptoms in a symptomatic palm use up to 3 times the amounts described in the table under Application Instructions. Once symptoms subside return to a preventative dosing schedule.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate Number of Palms Treated
140 g (5.0 oz.)	1250 mls	1320 mls	50
28g (1.0 oz.)	250 mls	264 mls	10
5.6g (0.2 oz.)	50 mls	52.8 mls	2
2.8g (0.1 oz.)	25 mls	26.4 mls	1

1. Determine total number of doses desired for project or container size.
2. Add quantity of ARBOR-OTC from [step one] or [first column] into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 10 palms.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Application Instructions: Due to the nature of the Palm's vascular system only one injection site is needed per palm per application.

Small Palm	Average Palm	Large Palm
< 6' Clear Trunk	6' – 15' Clear Trunk	> 15' Clear Trunk
16 mls of Solution	~26 mls of Solution	35 mls of Solution

Trunk diameter should be taken into consideration. A small trunk diameter can reduce by one category the dose required and a large trunk diameter can increase by one category the dose required

Treating Palms

Inject into the trunk into lignified (hardened, woody) tissues typically within 2-3 ft. of the soil. Drill into the stem 4" as instructed below. Inject through the Arborplug. Only one injection site is needed.

Using the STINGER Tip for Palms

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfect needles between trees.

Using ArborplugsTM for Palms

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug using the set tool and hammer. Inject by Inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Additional Injections in a Single Palm:

Additional injections can use the same hole as long as new tissue is accessed deeper in the hole. For additional injections:

Arborplug

Remove the plug and use a 3/16 drill bit and drill 1/2 inch deeper.

Drill the Arborplug hole 1/2 inch deeper and replace it with a new Arborplug*.

Inject Prescribed dose as instructed above using Arborplug.

Stinger

Use 3/16 inch drill to drill hole 1/2 inch deeper

Inject prescribed dose as outlined above for Stinger Tip

*Note: If you originally used the # 3 Arborplug, for re-treatment we recommend replacing with a # 4 Arborplug to more easily make the application using the original injection site.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool (<77°F, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer for recycling if available. If not, discard in sanitary landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Notice: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Tree injury, ineffectiveness or other unintended consequence may result because of such factors as manner of use or application, weather or tree conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ARBORJET, INC., or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ARBORJET, INC. and Seller harmless for any claims relating to such factors.

ARBORJET, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions. This warranty does not extend to the use of the product contrary to label instructions, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARBORJET, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

ARBORJET, INC. and Seller offer this product, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of ARBORJET, INC.

**Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801**

This label may contain some or all of the following statements. ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Phytoplasma Disease
Palms

ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Disease	Trees
Phytoplasma Disease	Palms

ARBOR-OTC

[Sub-label 2: Label for use in all other trees except Palm]

[Injectable Antibiotic]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing trees including Bacterial Leaf Scorch and Fire Blight

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none">Hold eye open and rinse slowly and gently with water for 15-20 minutes.Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">Move person to fresh air.If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

[See inside booklet for [First Aid], Restrictions and Precautionary Statements]

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

Arborculture In Motion®

Arbor-OTC is a [registered] trademark of Arborjet Inc.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

This product contains the antibiotic oxytetracycline. To reduce the development of drug-resistant bacteria and maintain the effectiveness of this and other antibacterial products, this product should be used only to treat or prevent infections that are proven or strongly suspected to be caused by bacteria.

This material is not to be used for medical or veterinary purposes.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application Method

For treatment of Bacterial Leaf Scorch, Fire Blight and Ash Yellows using the Arborjet Injection System

Apply once per growing season in spring after leaves have fully developed. Scorch symptoms are suppressed only during the growing season in which treatment is administered. Re-treatment is required during each growing season for continued suppression.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate DBH inches of Tree Treated
140g (5.0 oz.)	1250 mls	1320 mls	500 inches
28g (1.0 oz.)	250 mls	264 mls	100 inches
2.8g (0.1 oz.)	25 mls	26.4 mls	10 inches
1.4g (0.05 oz.)	12.5 mls	13.2 mls	5 inches

1. Measure the tree diameter at breast height (DBH) to determine the dose that is needed.
2. Add quantity of ARBOR-OTC from [step one] or [first column] into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 100 DBH inches of trees.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Injection into Trees:

To determine the application/dose rate per tree:

- 1) Measure the tree diameter in inches at chest height (4½ feet from ground) to find the Diameter at Breast Height (DBH). (If measuring tree circumference, divide circumference by 3 to obtain the DBH in inches.)
- 2) Calculate the number of injection sites by dividing the DBH in inches by 2.
- 3) Divide the total dose by the number of injection sites to determine required dosage per injection site.

Example: For a tree with a DBH of 10 inches (or circumference of 30 inches):

- 1) DBH = 10" (circumference 30" ÷ 3 = 10").
- 2) Divide DBH of 10" by 2 = 5 injection sites.
- 3) Divide 26.4 mL by 5 injection sites = 5.28 mL per injection site.

Using the STINGER Tip

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfect needles between trees.

Using Arborplugs™

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug, countersink to the thickness of the bark using the set tool and hammer. Inject by Inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Future Injections in the Same Tree:

Future injections in the same tree are applied into new holes placed intermediate to the old injection sites. Drill new sites either above or below (by 2" vertically) to the old sites and 2 to 3" horizontally from them. Applied correctly, this will form a triangular pattern with the old sites.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool (<77°F, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer for recycling if available. If not, discard in sanitary landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Notice: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Tree injury, ineffectiveness or other unintended consequence may result because of such factors as manner of use or application, weather or tree conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ARBORJET, INC. or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ARBORJET, INC. and Seller harmless for any claims relating to such factors.

ARBORJET, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions. This warranty does not extend to the use of the product contrary to label instructions, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARBORJET, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

ARBORJET, INC. and Seller offer this product, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of ARBORJET, INC.

**Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801**

This label may contain some or all of the following statements.

ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Ash Yellows	Cotoneaster	Witches' Broom (caused by mycoplasma-like organisms)
Ash	Crabapple	Apple
Bacterial blast	Creambush	Ash
Apple	Firethorn	Dogwood
Pear	Flowering Quince	Elm
Bacterial Blight	Hawthorn	Lilac
Flowering Crabapple	Indian Hawthorn	Locust
Hawthorn	Loquat	Peach
Lilac	Mountain Ash	Sassafras
Walnut	Ninebark	X-Disease
Bacterial Canker	Pear	Cherry
Hickory	Pearlbush	Chokecherry
Horsechestnut	Photinia	Nectarine
Maple	Plum	Peach
Mimosa	Quince	Plum
Oak	Rose	
Persian Walnut	Serviceberry	
Walnut	Fruit Spot	
Bacterial Leaf Scorch	Avocado	
Elm	Leaf and Shoot Blight	
Gum	Mock Orange	
Oak	Leaf Blight and Brown Rot	
Oleander	Mandarin Orange	
Sycamore	Leaf Spot	
Blossom Blast	Basswood	
Citrus	Hibiscus	
Grapefruit	Magnolia	
Lime	Lethal Decline	
Tea rose	Basswood	
Walnut	Hibiscus	
Blossom Blight and Canker	Magnolia	
Almond	Phloem Necrosis	
Apricot	Elm	
Cherry	Stem Canker	
Peach	Poplar	
Pear	Stubborn Disease	
Plum	Citrus	
Bunch Disease	Tip Dieback	
Butternut	Maple	
Pecan	Vascular Yellows	
Walnut	Ash	
Crown Gall	Elm	
Flowering Quince	Wetwood / Slime Flux	
Quince	Apple	
Decline	Cherry	
Peach	Elm	
Pear	Hickory	
Nectarine	Maple	
Fire Blight	Oak	
Apple	Peach	
Apricot	Pear	
Cherry	Plum	
Chokecherry	Poplar	
Cliff rose	Walnut	

Material Sent for Data Extraction

Reg. # 74578-7

Description: Reg. Notice

☐ Material(s) Sent to Data Extraction Contractors:

☒ New Stamped Label Dated 6/13/13

☐ Notification Dated _____

☐ New CSF(s) Dated _____

☐ Other: _____

☐ Decision #: _____

☐ Other Action/Comments: _____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: S. Hill

Phone: 347-8941 Division: RD

Date: 6/13/13



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Chemical Safety and Pollution Prevention
Office of Pesticide Programs
Registration Division (7504P)
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration
(under FIFRA, as amended)

EPA Reg. Number:

74578-7

Date of
Issuance:

JUN 13 2013

Term of Issuance:

Conditional

Name of Pesticide Product:

Arbor-OTC

Name and Address of Registrant (include ZIP Code):

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801

Mailed to Agent:

Jeff Jones
Delta Analytical Corporation
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration of your product under FIFRA sec 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.

Page 1 of 2

Signature of Approving Official:

Driss Benmhend, Acting Product Manager (20)
Fungicide Branch/Registration Division/OPP/OCSP (7504P)

Date:

JUN 13 2013

2. Make the following changes to the label:
 - a. Change the product registration number to "EPA Reg. No. 74578-7"
3. Submit one copy of the revised final printed label for the record before the product is released for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A copy of the label stamped "Accepted" is enclosed for your records.



Driss Benmhend
Acting Product Manager 20
Fungicide Branch
Registration Division (7504P)

Enclosure:
Label stamped "Accepted"

ARBOR-OTC

[Sub-label 1: Palm Tree Use]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing palms including Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline).

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

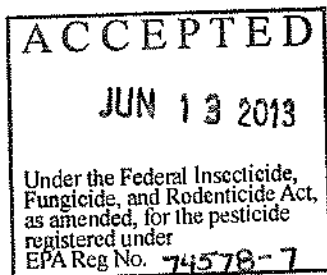
Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none">Hold eye open and rinse slowly and gently with water for 15-20 minutes.Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">Move person to fresh air.If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-
EPA Est. No. 74578-MA-001



Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

This product contains the antibiotic oxytetracycline. To reduce the development of drug-resistant bacteria and maintain the effectiveness of this and other antibacterial products, this product should be used only to treat or prevent infections that are proven or strongly suspected to be caused by bacteria.

This material is not to be used for medical or veterinary purposes.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application in Palm Trees

Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline) in Palms using the Arborjet Injection System

Apply to Palms 3-4 times annually for continuous protection from Phytoplasma Disease. For suppression of symptoms in a symptomatic palm use up to 3 times the amounts described in the table under Application Instructions. Once symptoms subside return to a preventative dosing schedule.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate Number of Palms Treated
140 g (5.0 oz.)	1250 mls	1320 mls	50
28g (1.0 oz.)	250 mls	264 mls	10
5.6g (0.2 oz.)	50 mls	52.8 mls	2
2.8g (0.1 oz.)	25 mls	26.4 mls	1

1. Determine total number of doses desired for project or container size.
2. Add quantity of ARBOR-OTC from step one into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 10 palms.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Application Instructions: Due to the nature of the Palm's vascular system only one injection site is needed per palm per application.

Small Palm	Average Palm	Large Palm
< 6' Clear Trunk	6' – 15' Clear Trunk	> 15' Clear Trunk
16 mls of Solution	~26 mls of Solution	35 mls of Solution

Trunk diameter should be taken into consideration. A small trunk diameter can reduce by one category the dose required and a large trunk diameter can increase by one category the dose required

Treating Palms

Inject into the trunk into lignified (hardened, woody) tissues typically within 2-3 ft. of the soil. Drill into the stem 4" as instructed below. Inject through the Arborplug. Only one injection site is needed.

Using the STINGER Tip for Palms

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfect needles between trees.

Using Arborplugs™ for Palms

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug using the set tool and hammer. Inject by Inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Additional Injections in a Single Palm:

Additional injections can use the same hole as long as new tissue is accessed deeper in the hole. For additional injections:

Arborplug

Remove the plug and use a 3/16 drill bit and drill 1/2 inch deeper.

Drill the Arborplug hole 1/2 inch deeper and replace it with a new Arborplug*.

Inject Prescribed dose as instructed above using Arborplug.

Stinger

Use 3/16 inch drill to drill hole 1/2 inch deeper

Inject prescribed dose as outlined above for Stinger Tip

*Note: If you originally used the # 3 Arborplug, for re-treatment we recommend replacing with a # 4 Arborplug to more easily make the application using the original injection site.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool (<77°F, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke, or equivalent. Offer for recycling if available. If not, discard in sanitary

landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Notice: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Tree injury, ineffectiveness or other unintended consequence may result because of such factors as manner of use or application, weather or tree conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ARBORJET, INC., or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ARBORJET, INC. and Seller harmless for any claims relating to such factors.

ARBORJET, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions. This warranty does not extend to the use of the product contrary to label instructions, and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARBORJET, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.

ARBORJET, INC. and Seller offer this product, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of ARBORJET, INC.

Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801

This label may contain some or all of the following statements. ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Phytoplasma Disease
Palms

ARBOR-OTC

[Sub-label 2: Label for use in all other trees except Palm]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing trees including Bacterial Leaf Scorch.

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none">▪ Hold eye open and rinse slowly and gently with water for 15-20 minutes.▪ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.▪ Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">▪ Move person to fresh air.▪ If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.▪ Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

This product contains the antibiotic oxytetracycline. To reduce the development of drug-resistant bacteria and maintain the effectiveness of this and other antibacterial products, this product should be used only to treat or prevent infections that are proven or strongly suspected to be caused by bacteria.

This material is not to be used for medical or veterinary purposes.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application Method

For treatment of Bacterial Leaf Scorch, Fire Blight and Ash Yellows using the Arborjet Injection System

Apply once per growing season in spring after leaves have fully developed. Scorch symptoms are suppressed only during the growing season in which treatment is administered. Re-treatment is required during each growing season for continued suppression.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate DBH inches of Tree Treated
140g (5.0 oz.)	1250 mls	1320 mls	500 inches
28g (1.0 oz.)	250 mls	264 mls	100 inches
2.8g (0.1 oz.)	25 mls	26.4 mls	10 inches
1.4g (0.05 oz.)	12.5 mls	13.2 mls	5 inches

1. Measure the tree diameter at breast height (DBH) to determine the dose that is needed.
2. Add quantity of ARBOR-OTC from step one into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 100 DBH inches of trees.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Injection into Trees:

To determine the application/dose rate per tree:

- 1) Measure the tree diameter in inches at chest height (4½ feet from ground) to find the Diameter at Breast Height (DBH). (If measuring tree circumference, divide circumference by 3 to obtain the DBH in inches.)
- 2) Calculate the number of injection sites by dividing the DBH in inches by 2.
- 3) Divide the total dose by the number of injection sites to determine required dosage per injection site.

Example: For a tree with a DBH of 10 inches (or circumference of 30 inches):

- 1) DBH = 10" (circumference 30" ÷ 3 = 10").
- 2) Divide DBH of 10" by 2 = 5 injection sites.
- 3) Divide 26.4 mL by 5 injection sites = 5.28 mL per injection site.

Using the STINGER Tip

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfect needles between trees.

Using Arborplugs™

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug, countersink to the thickness of the bark using the set tool and hammer. Inject by inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Future Injections in the Same Tree:

Future injections in the same tree are applied into new holes placed intermediate to the old injection sites. Drill new sites either above or below (by 2" vertically) to the old sites and 2 to 3" horizontally from them. Applied correctly, this will form a triangular pattern with the old sites.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool (<77°F, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke, or equivalent. Offer for recycling if available. If not, discard in sanitary landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Notice: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Tree injury, ineffectiveness or other unintended consequence may result because of such factors as manner of use or application, weather or tree conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ARBORJET, INC. or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ARBORJET, INC. and Seller harmless for any claims relating to such factors.

ARBORJET, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions. This warranty does not extend to the use of the product contrary to label instructions, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARBORJET, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

ARBORJET, INC. and Seller offer this product, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of ARBORJET, INC

**Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801**

This label may contain some or all of the following statements.

ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Ash Yellows	Cotoneaster	Witches' Broom (caused by mycoplasma-like organisms)
Ash	Crabapple	Apple
Bacterial blast	Creambush	Ash
Apple	Firethorn	Dogwood
Pear	Flowering Quince	Elm
Bacterial Blight	Hawthorn	Lilac
Flowering Crabapple	Indian Hawthorn	Locust
Hawthorn	Loquat	Peach
Lilac	Mountain Ash	Sassafras
Walnut	Ninebark	X-Disease
Bacterial Canker	Pear	Cherry
Hickory	Pearlbush	Chokecherry
Horsechestnut	Photinia	Nectarine
Maple	Plum	Peach
Mimosa	Quince	Plum
Oak	Rose	
Persian Walnut	Serviceberry	
Walnut	Fruit Spot	
Bacterial Leaf Scorch	Avocado	
Elm	Leaf and Shoot Blight	
Gum	Mock Orange	
Oak	Leaf Blight and Brown Rot	
Oleander	Mandarin Orange	
Sycamore	Leaf Spot	
Blossom Blast	Basswood	
Citrus	Hibiscus	
Grapefruit	Magnolia	
Lime	Lethal Decline	
Tea rose	Basswood	
Walnut	Hibiscus	
Blossom Blight and Canker	Magnolia	
Almond	Phloem Necrosis	
Apricot	Elm	
Cherry	Stem Canker	
Peach	Poplar	
Pear	Stubborn Disease	
Plum	Citrus	
Bunch Disease	Tip Dieback	
Butternut	Maple	
Pecan	Vascular Yellows	
Walnut	Ash	
Crown Gall	Elm	
Flowering Quince	Wetwood / Slime Flux	
Quince	Apple	
Decline	Cherry	
Peach	Elm	
Pear	Hickory	
Nectarine	Maple	
Fire Blight	Oak	
Apple	Peach	
Apricot	Pear	
Cherry	Plum	
Chokecherry	Poplar	
Cliff rose	Walnut	

Hill, Shaunta

From: Susan Stracquatano [sstracquatano@delta-ac.com]
Sent: Thursday, June 06, 2013 4:44 PM
To: Hill, Shaunta
Cc: Benmhend, Driss; 'Jeff Jones'; 'Russ Davis'
Subject: RE: Label corrections for 74578-T
Attachments: 074578-xxxxx.20130606.pdf

Shaunta,

Attached is the label with the revisions as requested.

Thanks for your efforts to move this along.

Best regards,
Susan Stracquatano
sstracquatano@delta-ac.com
Delta Analytical Corporation
12510 Prosperity Dr., Ste 160
Silver Spring, MD 20904
301 680-7971
301 680-7975 fax

From: Hill, Shaunta [<mailto:Hill.Shaunta@epa.gov>]
Sent: Thursday, June 06, 2013 3:35 PM
To: sstracquatano@delta-ac.com
Cc: Benmhend, Driss
Subject: Label corrections for 74578-T

Hello Susan,

In reviewing the draft labeling for the subject product, a correction was noted for the "Directions for Use" sections on pages 2 and 7. Immediately following the sub-heading "Restrictions" on both pages, add the following text:

"This product contains the antibiotic oxytetracycline. To reduce the development of drug-resistant bacteria and maintain the effectiveness of this and other antibacterial products, this product should be used only to treat or prevent infections that are proven or strongly suspected to be caused by bacteria.

This material is not to be used for medical or veterinary purposes."

Once this text has been incorporated, you may send the revised label to me (via email) using the attached guidance document to name the file. If you have any questions, please let me know.

Regards,

Shaunta Hill, Ph. D
U.S. EPA :Office of Chemical Safety and Pollution Prevention
Registration Division/Fungicide Branch
1200 Pennsylvania Avenue, NW (7504P)
Washington, DC 20460

Tel: 703.347.8961 | Fax: 703.305.6920

E-mail: hill.shaunta@epa.gov

URL Address: www.epa.gov/pesticides

Hill, Shaunta

From: Hill, Shaunta
Sent: Thursday, June 06, 2013 3:35 PM
To: 'sstracquatano@delta-ac.com'
Cc: Benmhend, Driss
Subject: Label corrections for 74578-T
Attachments: Naming e-labels.pdf

Hello Susan,

In reviewing the draft labeling for the subject product, a correction was noted for the "Directions for Use" sections on pages 2 and 7. Immediately following the sub-heading "Restrictions" on both pages, add the following text:

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Once this text has been incorporated, you may send the revised label to me (via email) using the attached guidance document to name the file. If you have any questions, please let me know.

Regards,

Shaunta Hill, Ph. D
U.S. EPA :Office of Chemical Safety and Pollution Prevention
Registration Division/Fungicide Branch
1200 Pennsylvania Avenue, NW (7504P)
Washington, DC 20460

Tel: 703.347.8961 | Fax: 703.305.6920
E-mail: hill.shaunta@epa.gov
URL Address: www.epa.gov/pesticides

ARBOR-OTC

[Sub-label 1: Palm Tree Use]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing palms including Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline).

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none">Hold eye open and rinse slowly and gently with water for 15-20 minutes.Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">Move person to fresh air.If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

updates needed

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application in Palm Trees

Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline) in Palms using the Arborjet Injection System

Apply to Palms 3-4 times annually for continuous protection from Phytoplasma Disease. For suppression of symptoms in a symptomatic palm use up to 3 times the amounts described in the table under Application Instructions. Once symptoms subside return to a preventative dosing schedule.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate Number of Palms Treated
140 g (5.0 oz.)	1250 mls	1320 mls	50
28g (1.0 oz.)	250 mls	264 mls	10
5.6g (0.2 oz.)	50 mls	52.8 mls	2
2.8g (0.1 oz.)	25 mls	26.4 mls	1

1. Determine total number of doses desired for project or container size.
2. Add quantity of ARBOR-OTC from step one into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 10 palms.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Application Instructions: Due to the nature of the Palm's vascular system only one injection site is needed per palm per application.

Small Palm	Average Palm	Large Palm
< 6' Clear Trunk	6' - 15' Clear Trunk	> 15' Clear Trunk
16 mls of Solution	~26 mls of Solution	35 mls of Solution

Trunk diameter should be taken into consideration. A small trunk diameter can reduce by one category the dose required and a large trunk diameter can increase by one category the dose required

Treating Palms

Inject into the trunk into lignified (hardened, woody) tissues typically within 2-3 ft. of the soil. Drill into the stem 4" as instructed below. Inject through the Arborplug. Only one injection site is needed.

Using the STINGER Tip for Palms

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfect needles between trees.

Using ArborplugsTM for Palms

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug using the set tool and hammer. Inject by Inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Additional Injections in a Single Palm:

Additional injections can use the same hole as long as new tissue is accessed deeper in the hole. For additional injections:

Arborplug

Remove the plug and use a 3/16 drill bit and drill 1/2 inch deeper.

Drill the Arborplug hole 1/2 inch deeper and replace it with a new Arborplug*.

Inject Prescribed dose as instructed above using Arborplug.

Stinger

Use 3/16 inch drill to drill hole 1/2 inch deeper

Inject prescribed dose as outlined above for Stinger Tip

*Note: If you originally used the # 3 Arborplug, for re-treatment we recommend replacing with a # 4 Arborplug to more easily make the application using the original injection site.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool (<77°F, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke, or equivalent. Offer for recycling if available. If not, discard in sanitary landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Notice: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Tree injury, ineffectiveness or other unintended consequence may result because of such factors as manner of use or application, weather or tree conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ARBORJET, INC., or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ARBORJET, INC. and Seller harmless for any claims relating to such factors.

ARBORJET, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions. This warranty does not extend to the use of the product contrary to label instructions, and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARBORJET, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.

ARBORJET, INC. and Seller offer this product, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of ARBORJET, INC.

**Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801**

This label may contain some or all of the following statements. ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Phytoplasma Disease
Palms

ARBOR-OTC

[Sub-label 2: Label for use in all other trees except Palm]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing trees including Bacterial Leaf Scorch.

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none">▪ Hold eye open and rinse slowly and gently with water for 15-20 minutes.▪ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.▪ Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">▪ Move person to fresh air.▪ If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.▪ Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application Method

For treatment of Bacterial Leaf Scorch, Fire Blight and Ash Yellows using the Arborjet Injection System

Apply once per growing season in spring after leaves have fully developed. Scorch symptoms are suppressed only during the growing season in which treatment is administered. Re-treatment is required during each growing season for continued suppression.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate DBH inches of Tree Treated
140g (5.0 oz.)	1250 mls	1320 mls	500 inches
28g (1.0 oz.)	250 mls	264 mls	100 inches
2.8g (0.1 oz.)	25 mls	26.4 mls	10 inches
1.4g (0.05 oz.)	12.5 mls	13.2 mls	5 inches

1. Measure the tree diameter at breast height (DBH) to determine the dose that is needed.
2. Add quantity of ARBOR-OTC from step one into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 100 DBH inches of trees.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Injection into Trees:

To determine the application/dose rate per tree:

- 1) Measure the tree diameter in inches at chest height (4½ feet from ground) to find the Diameter at Breast Height (DBH). (If measuring tree circumference, divide circumference by 3 to obtain the DBH in inches.)
- 2) Calculate the number of injection sites by dividing the DBH in inches by 2.
- 3) Divide the total dose by the number of injection sites to determine required dosage per injection site.

Example: For a tree with a DBH of 10 inches (or circumference of 30 inches):

- 1) DBH = 10" (circumference 30" ÷ 3 = 10").
- 2) Divide DBH of 10" by 2 = 5 injection sites.
- 3) Divide 26.4 mL by 5 injection sites = 5.28 mL per injection site.

Using the STINGER Tip

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfect needles between trees.

Using Arborplugs™

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug, countersink to the thickness of the bark using the set tool and hammer. Inject by Inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Future Injections in the Same Tree:

Future injections in the same tree are applied into new holes placed intermediate to the old injection sites. Drill new sites either above or below (by 2" vertically) to the old sites and 2 to 3" horizontally from them. Applied correctly, this will form a triangular pattern with the old sites.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool (<77°F, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke, or equivalent. Offer for recycling if available. If not, discard in sanitary landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Notice: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Tree injury, ineffectiveness or other unintended consequence may result because of such factors as manner of use or application, weather or tree conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ARBORJET, INC. or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ARBORJET, INC. and Seller harmless for any claims relating to such factors.

ARBORJET, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions. This warranty does not extend to the use of the product contrary to label instructions, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARBORJET, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

ARBORJET, INC. and Seller offer this product, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of ARBORJET, INC.

**Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801**

This label may contain some or all of the following statements.

ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Ash Yellows	Cotoneaster	Witches' Broom (caused by mycoplasma-like organisms)
Ash	Crabapple	Apple
Bacterial blast	Creambush	Ash
Apple	Firethorn	Dogwood
Pear	Flowering Quince	Elm
Bacterial Blight	Hawthorn	Lilac
Flowering Crabapple	Indian Hawthorn	Locust
Hawthorn	Loquat	Peach
Lilac	Mountain Ash	Sassafras
Walnut	Ninebark	X-Disease
Bacterial Canker	Pear	Cherry
Hickory	Pearlbush	Chokecherry
Horsechestnut	Photinia	Nectarine
Maple	Plum	Peach
Mimosa	Quince	Plum
Oak	Rose	
Persian Walnut	Serviceberry	
Walnut	Fruit Spot	
Bacterial Leaf Scorch	Avocado	
Elm	Leaf and Shoot Blight	
Gum	Mock Orange	
Oak	Leaf Blight and Brown Rot	
Oleander	Mandarin Orange	
Sycamore	Leaf Spot	
Blossom Blast	Basswood	
Citrus	Hibiscus	
Grapefruit	Magnolia	
Lime	Lethal Decline	
Tea rose	Basswood	
Walnut	Hibiscus	
Blossom Blight and Canker	Magnolia	
Almond	Phloem Necrosis	
Apricot	Elm	
Cherry	Stem Canker	
Peach	Poplar	
Pear	Stubborn Disease	
Plum	Citrus	
Bunch Disease	Tip Dieback	
Butternut	Maple	
Pecan	Vascular Yellows	
Walnut	Ash	
Crown Gall	Elm	
Flowering Quince	Wetwood / Slime Flux	
Quince	Apple	
Decline	Cherry	
Peach	Elm	
Pear	Hickory	
Nectarine	Maple	
Fire Blight	Oak	
Apple	Peach	
Apricot	Pear	
Cherry	Plum	
Chokecherry	Poplar	
Cliff rose	Walnut	

Explore Registrations

Reg Number: 74578-T
Reg Type: Product Registration - Section 3
Status: Under Review (10-Oct-2012)

Name: ARBOR-OTC
<View Registration Details>

(No New Receipts)

S	Submission Type	OPP Rec'd Date	Resubmission	Description

...Decisions...

- Data Requirements
- D: Pending; 470625; 74578-T; R310; NEW END-L
- 75-Day Letters
- S: 925276 10/10/2012; New Registration

S: 925276 Reg #: 74578-T

Submission Type: New Registration

Resubmission? ☐ Yes ☒ No E-Sub #:

Decision #:

Submitter Company: ARBORJET, INC

Application Date: 09-Oct-2012

OPP Received Date: 10-Oct-2012 Date Sent to Risk manager: 12-Oct-2012

Studies Included? ☐ Yes ☒ No Fast Track? ☐ Yes ☒ No

Form A Signed? ☐ Yes ☐ No ☒ None Date:

Form B Signed? ☐ Yes ☐ No ☒ None Date:

Reviewer: Hill, Shaunta

Received DT: Editable Due DT:

Submission Due DT: 05-Aug-2013 Response: D, 10-Oct-2012

Priority Weight: Priority Points:

Comments: Me-too-repack subst similar to 88482-1

Action Recoded R300 → R310 as a result of the tech review screen

Explore Registrations

Reg Number: 74578-T

Reg. Type: Product Registration - Section 3

Status: Under Review (10-Oct-2012)

Name: ARBOR-OTC

<View Registration Details>

(No New Receipts)

S	Submission Type	OPP Rec'd Date	Resubmission	Description
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...Decisions...

Data Requirements

Pending: 470625, 74578-T, R310, NEW END-USE

75-Day Letters

S: 925276 10/10/2012; New Registration; 7-

Decision Sequence: 470625

Action: R310

NEW END-USE OR MANUFACTURING USE PROD

Number: 74578-T

Original Decision:

Name: ARBOR-OTC

Decision Status: PENDING (12-Oct-2012)

Organization Owner: RD / FB

Team Owner: RM FFS

FFS Start Date: 03-Jan-2013

Received by Risk Manager:

Due Date: 05-Aug-2013

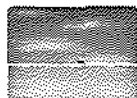
FFS Amt Expected: \$4,807

Negotiated Due Date:

FFS Amt Refunded:

FFS Amt Received: \$4,807

Comments: Tech screen def letter emailed 11/29/12. Applicant confirmed receipt of tech screen def 11/29/12. OPPIN updated to start the 10-day period 11/29/12.



Fw: File symbol 74578-T

Cynthia Giles-Parker to: Shaunta Hill

01/14/2013 12:50 PM

From: Cynthia Giles-Parker/DC/USEPA/US
To: Shaunta Hill/DC/USEPA/US@EPA

----- Forwarded by Cynthia Giles-Parker/DC/USEPA/US on 01/14/2013 12:49 PM -----

From: Cynthia Giles-Parker/DC/USEPA/US
To: Shaunta Hill/DC/USEPA/US@EPA
Date: 12/13/2012 08:47 AM
Subject: Fw: File symbol 74578-T

Shaunta

Please file the response to the 10-day tech deficiency letter in the jacket.

----- Forwarded by Cynthia Giles-Parker/DC/USEPA/US on 12/13/2012 08:46 AM -----

From: Stephen Schaible/DC/USEPA/US
To: Michael Yanchulis/DC/USEPA/US@EPA
Cc: Jeff Jones <jjones@delta-ac.com>, Cynthia Giles-Parker/DC/USEPA/US@EPA, William Cutchin/DC/USEPA/US@EPA
Date: 12/13/2012 08:36 AM
Subject: Fw: File symbol 74578-T

Hi Mick,

Can you please recode the PRIA action associated with EPA File Symbol 74578-T from its current R300 category to the R310 category and invoice the registrant for the difference? The rationale for this code change is that the label on the proposed product was found to deviate from the registered product being repackaged. This kicks it out of the "100% repack" definition and the R300 category.

If this can be done today it would be helpful. A 10-day letter was sent to the registrant under the technical deficiency screen and this recode is the registrant-preferred resolution to the deficiencies identified in that letter. The expiration of the 10-day window for response is today.

Cynthia- while agreeing to the recode, Jeff has requested a meeting in January to discuss this application and a path forward for evaluation under an expedited time frame.

Regards, Steve

Stephen A. Schaible, PRIA Ombudsman
Registration Division (7505P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
ph: (703)308-9362
fax: (703)305-6920
fax: (703)305-6920

----- Forwarded by Stephen Schaible/DC/USEPA/US on 12/13/2012 08:26 AM -----

From: "Jeff Jones" <jjones@delta-ac.com>
To: Stephen Schaible/DC/USEPA/US@EPA
Cc: "Joe Doccola" <joedoccola@arborjet.com>, "Russ Davis" <RussDavis@arborjet.com>, "Susan

Hi Jeff,

As it has been explained to me, the application is deficient under the R300 category because it does not fit the definition of a "100% repack" and therefore falls outside of that PRIA category. Recoding to the R310 category and continuing the review is one option for you; amending the proposed label to match that of the repacked product is another. There is little flexibility available in the PRIA category definitions- the application as it currently exists does not fit the R300 category. Should you choose to pursue this recode, the PRIA clock will be reset once proof of payment for the outstanding balance between the R300 and R310 categories is received.

As to whether a decision on this action can be completed prior to the PRIA due date, that is a discussion to have with the Fungicide Branch. While the PRIA categories (and therefore fees and time frames) are not flexible, the Agency has some flexibility in certain circumstances to account for review work required under the discretionary refund provision of PRIA. Here is the link if you wish to investigate that further and see if you think it would apply in your case. <http://www.epa.gov/pesticides/fees/fee-reduction-guidance.pdf>

If so, you would need to request that a discretionary refund be considered in association with your application. The full fee (or in your case, the full outstanding balance) would need to be provided up front and the refund would be determined after review of the application is completed.

I am out of the office tomorrow but would be happy to discuss this with you further on Monday.

Regards, Steve

Stephen A. Schaible, PRIA Ombudsman
Registration Division (7505P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
ph: (703)308-9362
fax: (703)305-6920
fax: (703)305-6920

From: "Jeff Jones" <jjones@delta-ac.com>
To: Stephen Schaible/DC/USEPA/US@EPA
Cc: "Joe Doccola" <joedoccola@arborjet.com>, "Russ Davis" <RussDavis@arborjet.com>, "Susan Stracquatano" <sstracquatano@delta-ac.com>
Date: 12/05/2012 02:37 PM
Subject: FW: File symbol 74578-T

Steve:

I don't have issue with different PRIA category (see below) unless the PRIA clock would return to zero upon re-categorization. The application is a 100% repack from formulation point of view, and the only label deviation calls for diluting the product with twice the amount of water prior to injection into trees. I have trouble imagining how this minor label change would affect the Agency's risk calculation for a product that would otherwise fall into repack category and otherwise "substantially similar" category. If we can't preserve our current time clock, I ask that a risk manager explain why this minor change to label directions could be significant from the Agency's point of view.

Thanks for your consideration,
Jeff Jones



Re: File symbol 74578-T

Shaunta Hill to: Jeff Jones

12/04/2012 04:32 PM

Cc: "Joe Doccola", "Russ Davis", "Susan Stracquatano", William Cutchin

From: Shaunta Hill/DC/USEPA/US

To: "Jeff Jones" <jjones@delta-ac.com>

Cc: "Joe Doccola" <JoeDoccola@arborjet.com>, "Russ Davis" <RussDavis@arborjet.com>, "Susan Stracquatano" <sstracquatano@delta-ac.com>, William Cutchin/DC/USEPA/US@EPA

Hello Jeff,

100% repacks must reflect the directions of the parent product. If you wish to retain the proposed labeling as is, you will need to speak with our PRIA ombudsman for re-coding of the application (Steve Schaible, schaible.stephen@epa.gov, 703-308-9362). If you wish to retain the R300/repack classification, the labeling must be revised.

Regards,

Shaunta Hill, Ph. D

U.S. EPA :Office of Chemical Safety and Pollution Prevention

Registration Division/Fungicide Branch

1200 Pennsylvania Avenue, NW (7504P)

Washington, DC 20460

Tel: 703.347.8961 | Fax: 703.305.6920

E-mail: hill.shaunta@epa.gov

URL Address: www.epa.gov/pesticides

"Jeff Jones"

Ms. Hill: the higher dilution rate on the proposed...

12/03/2012 03:48:29 PM

From: "Jeff Jones" <jjones@delta-ac.com>

To: Shaunta Hill/DC/USEPA/US@EPA

Cc: "Susan Stracquatano" <sstracquatano@delta-ac.com>, "Russ Davis" <RussDavis@arborjet.com>, "Joe Doccola" <JoeDoccola@arborjet.com>

Date: 12/03/2012 03:48 PM

Subject: File symbol 74578-T

Ms. Hill: the higher dilution rate on the proposed label was intentional. It makes it easier to deliver the same amt. of AI to the tree. While this is a clear departure from prior directions for use, I can't imagine any practical effect on the Agency's assessment of risk. That is, you should be able to conclude that this change is insignificant from a risk point of view. If you disagree please help me understand how the change could be significant. Thanks for your consideration, Jeff Jonesy

Sent from my Verizon Wireless Phone



Re: FW: PRIA Technical Screen Failure Decision # 470625 

Shaunta Hill to: Jeff Jones

Cc: "Susan Stracqualanio"

12/03/2012 11:47 AM

From: Shaunta Hill/DC/USEPA/US
To: "Jeff Jones" <jjones@delta-ac.com>
Cc: "Susan Stracqualanio" <sstracqualanio@delta-ac.com>

Good Afternoon Jeff,

The omission of the signature date (11/29/12) was an error. A copy of the letter with the date is provided below.



[Untitled].pdf

Regards,

Shaunta Hill, Ph. D
U.S. EPA :Office of Chemical Safety and Pollution Prevention
Registration Division/Fungicide Branch
1200 Pennsylvania Avenue, NW (7504P)
Washington, DC 20460

Tel: 703.347.8961 | Fax: 703.305.6920
E-mail: hill.shaunta@epa.gov
URL Address: www.epa.gov/pesticides

"Jeff Jones"

I have received the attached email and letter. 11/29/2012 06:26:43 PM

From: "Jeff Jones" <jjones@delta-ac.com>
To: Shaunta Hill/DC/USEPA/US@EPA
Cc: "Susan Stracqualanio" <sstracqualanio@delta-ac.com>
Date: 11/29/2012 06:26 PM
Subject: FW: PRIA Technical Screen Failure Decision # 470625

I have received the attached email and letter.

Is the letter (pdf file) dated? If not, was that omission purposeful?

Best regards,
Jeff Jones

From: Hill.Shaunta@epamail.epa.gov [mailto:Hill.Shaunta@epamail.epa.gov]
Sent: Thursday, November 29, 2012 4:35 PM
To: jjones@delta-ac.com
Subject: PRIA Technical Screen Failure Decision # 470625



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Jeff Jones, Agent for
Arborjet, Inc.
c/o Delta Analytical Corporation
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

NOV 29 2012

Subject: PRIA Technical Screen Failure
EPA File Symbol: 74578-T
Application Date: 10/9/12
EPA Receipt Date: 10/10/12
Decision Number: 470625

Dear Mr Jones:

The Agency has completed its preliminary technical screening of your application pursuant to Section 33(f)(4)(B)(i)(II) of the Federal Insecticide, Fungicide, and Rodenticide (FIFRA), as amended by the Pesticide Registration Improvement Extension Act. The Agency has determined that your application has not passed the preliminary technical screen and therefore is subject to rejection if the application is not corrected.

As a 100% repack application, the directions for use on your proposed label must match the directions for use of the repack source. This is inclusive of the amount of water used for dilution of the product for application.

In order for the review of your product to continue, you will need to correct your application to address the item(s) listed above within 10 business days of the date you received this letter. If you cannot correct the application [or do not respond] within 10 business days, your application will be rejected.

If you have questions, please contact Shaunta Hill at hill.shaunta@epa.gov or 703-347-8961 or William Cutchin at cutchin.william@epa.gov or 703-305-7990.

Sincerely,

A handwritten signature in black ink that reads "Lois Rossi".

Lois Rossi
Office of Pesticide Programs



PRIA Technical Screen Failure Decision # 470625

Shaunta Hill to: jjones

Bcc: Shaunta Hill

11/29/2012 04:33 PM

From: Shaunta Hill/DC/USEPA/US
To: jjones@delta-ac.com
Bcc: Shaunta Hill/DC/USEPA/US

Jeff Jones, Agent for
Arborjet, Inc.
c/o Delta Analytical Corporation
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

Hello Mr. Jones,

The Agency has completed its preliminary technical screening of your application pursuant to Section 33(f)(4)(B)(i)(II) of the Federal Insecticide, Fungicide, and Rodenticide (FIFRA), as amended by the Pesticide Registration Improvement Extension Act. The Agency has determined that your application has not passed the preliminary technical screen and therefore is subject to rejection if the application is not corrected.

Within 10 business days of your receipt of this letter, you will need to correct your application. If you cannot correct the application [or do not respond] within 10 business days, your application will be rejected. Please reply to this email communication confirming your receipt of the attached letter. If you have any questions, please feel free to contact me.



[Untitled].pdf

Thank you

Regards,

Shaunta Hill, Ph. D
U.S. EPA :Office of Chemical Safety and Pollution Prevention
Registration Division/Fungicide Branch
1200 Pennsylvania Avenue, NW (7504P)
Washington, DC 20460

Tel: 703.347.8961 | Fax: 703.305.6920
E-mail: hill.shaunta@epa.gov
URL Address: www.epa.gov/pesticides

21-Day Screen Completed by
Contractor

21-Day Expires on 10/31/12

Jacket # 74578-T
MRID# _____

Content Screen: Recommend to **Pass/Fail**

11-3 Review: Pass/Fail/**NA**

Overall Status: Recommend to **Pass/Fail**

Transfer This Jacket to:

Stephen Schauble

PRIA 2 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

3/23/09

21 Day Screen Start Date: 10-10-12

Experts In-Processing Signature: B.B.

Date 10-15-12

Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date _____

EPA Reg. Number: <u>74578-T</u>		EPA Receipt Date: <u>10-10-12</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1)(link to form) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4) (Link to form)			X		
	a) All inerts (link to http://www.epa.gov/oppr001/inerts/), including fragrances, approved for the proposed uses (see Footnote A) <u>100% Repack</u>	yes	no			
3	Certification with Respect to Citation of Data (EPA Form 8570-34) (Link to form) completed and signed (N/A if 100% repack)					X
	Certificate and data matrix consistent					
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) (Link to form) completed and signed (N/A if source is unregistered or applicant owns the technical)			X		
	Data Matrix (EPA Form 8570-35) (Link to form) both internal and external copies (PR 98-5) (Link to PR 98-5) completed and signed (N/A if 100% repack)					X
5	a) Selective Method (Fee category experts use)	yes	no			
	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of Label (link to http://www.epa.gov/oppfead1/labeling/lrm/) (Electronic labels on CD are encouraged and guidance is available)(link to http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels)			X		

7	Is the data package consistent with PR Notice 86-5 (link to PRN 86-5)			X
8	Notice of Filing (link to http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm) included with petitions (link to http://www.epa.gov/pesticides/regulating/tolerances.htm)			X
9	If applicable for conventional applications, reduced risk rationale (link to http://www.epa.gov/opprd001/workplan/reducedrisk.html)			X
10	Required Data (link to http://www.epa.gov/pesticides/regulating/data_requirements.htm) and/or data waivers. See Footnote C.			
	a) List study (or studies) not included with application			

Comments:

100 % Repack, no inerts to review
There are no studies associated with this jacket

ID 10/15/12

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses. If an unapproved inert is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses **even if a product is currently registered** by consulting the inert Web

site [link to <http://www.epa.gov/oppr001/inerts/lists.html>] and if the inert is not approved, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch [Link to http://www.epa.gov/oppbppd1/biopesticides/contacts_bppd.htm].

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information [link to <http://www.epa.gov/oppr001/inerts/tips.pdf>] must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R311, R312 or R313), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 12, 2012

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OPP Decision Number: D-470625
EPA File Symbol or Registration Number: 74578-T
Product Name: ARBOR-OTC
EPA Receipt Date: 10-Oct-2012
EPA Company Number: 74578
Company Name: ARBORJET, INC.

JEFF JONES
DELTA ANALYTICAL CORPORATION
ARBORJET, INC.
12510 PROSPERITY DRIVE, SUITE 160
SILVER SPRING, MD 20904-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R300
NEW PRODUCT;OR SIMILAR COMBINATION PRODUCT (ALREADY REGISTERED) TO AN IDENTICAL OR SUBSTANTIALLY SIMILAR IN COMPOSITION AND USE TO A REGISTERED PRODUCT;
REGISTERED SOURCE OF ACTIVE INGREDIENT;NO DATA REVIEW ON ACUTE TOXICITY, EFFICACY OR CRP - ONLY PRODUCT CHEMISTRY DATA;CITE-ALL DATA CITATION, OR SELECTIVE DATA CITATION WHERE APPLICANT OWNS ALL REQUIRED DATA, OR APPLICANT SUBMITS SPECIFIC AUTHORIZATION LETTER FROM DATA OWNER;CATEGORY ALSO INCLUDES 100% RE-PACKAGE OF REGISTERED END-USE OR MANUFACTURING-USE PRODUCT THAT REQUIRES NO DATA SUBMISSION NOR DATA MATRIX;

No additional payment is due at this time. If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,

A handwritten signature in black ink, appearing to be "Za" or similar, is written over the word "Sincerely,".

Front End Processing Staff
Information Technology & Resources Management Division

R 300 and 301

100% identical (repack): YES or NO (circle one)

(If **yes**, it's a 100% repack - then product chemistry, acute toxicity and efficacy data are not required)

100% Repack

Data on Group A and B must be submitted - Group A and B can not be cited.

Guideline No.	Group A: Product Chemistry Data Study Title	Data submitted	
		Yes	No
830.1550	Product Identity & Composition		
830.1600	Description of materials used to produce the product		
830.1650	Description of formulation process		
830.1670	Discussion on the formation of impurities		
830.1700	Preliminary analysis		
830.1750	Certified limits (158.345)		
830.1800	Enforcement analytical method		

Guideline No.	Group B: Product Chemistry Data Study Title	Data submitted	
		Yes	No
830.6302	Color		
830.6303	Physical State		
830.6304	Odor		
830.6314	Oxidation/Reduction (Chemical incompatibility)		
830.6315	Flammability		
830.6316	Explodability		
830.6317	Storage stability		
830.6319	Miscibility		
830.6320	Corrosion Characteristics		
830.6321	Dielectric Breakdown voltage		
830.7000	pH		
830.7100	Viscosity		
830.7300	Density		

R 300 and 301

New products must provide a bridging rationale document. The bridging document directs OPP to use a currently registered set of 6 acute toxicity data and label; instead of submitting product specific data.

Guideline No.	Acute toxicity (6 pack) Study Title	Cited	
		Yes	No
870.1100	Acute Oral (LD50)		
870.1200	Acute Dermal (LD50)		
870.1300	Acute Inhalation (LC50)		
870.2400	Acute Eye Irritation		
870.2500	Acute Dermal Irritation		
870.2600	Dermal Sensitization		

Efficacy – which guideline depends on the proposed label use and they must cite the data to be used for the bridging rationale.

Guideline No.	Efficacy Study Titles	Cited		Comments
		Yes	No	
810.3100	Soil Treatments for Imported Fire Ants			
810.3200	Livestock, Poultry, Fur and Wool-Bearing Animal Treatments			
810.3300	Treatments to Control Pests of Humans and Pets			
810.3400	Mosquito, Black Fly, and Biting Midge (Sand Fly) Treatments			
810.3500	Premises Treatments			
810.3600	Structural Treatments			
810.3800	Methods for Efficacy Testing of Termite Baits			

Fee for Service

{925276?~

This package includes the following

- ☐ New Registration
- ☐ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 20

Receipt No.

S-

925276

EPA File Symbol/Reg. No.

74578-T

Pin-Punch Date:

10/10/2012

☐ This item is NOT subject to FFS action.

Action Code:

Requested:

R300

Granted:

R300

Amount Due: \$ 1434⁰⁰

100% repack

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: Kimmonly

Date: 10/11/12

Remarks:

No similarity review needed - repack.

Receipt for Section 3

S: Resubmission: ☐ Yes ☒ No

Regulatory Type: Fee For Service: ☒ Yes ☐ No

Application Type: Billable: ☒ Yes ☐ No

Company:

Risk Manager:

Product #: Product Name:

Override#:

Me Too Section 3: Me Too Product Name:

Application Date: OPP Rec'd Date:

Front End Date: Risk Manager Send Date:

FFS Due Date: Negotiated Due Date:

OPP Target Date:

Fast Track: ☐ New Ingredient: ☐

Receipt Description:

Form A: ☐ Signature Date: Form B: ☐ Signature Date:

New Ingredient Request Date:
 New Ingredient Received Date:

Print Letter
 Enter More Information
 Tracking

Receipt Content	Description
CSF	
Paper Label	

< >

View/Edit

Product ingredient source information may be entitled to confidential treatment



October 9, 2012

Product ingredient source information may be entitled to confidential treatment

Document Processing Desk (APPL)
Office of Pesticide Programs (7504P)
Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive, Room S-4900
Arlington VA 22202

Attn: Shaja Joyner (PM 20)

Re: **Application for New Product Registration; "Me-too" Repack**
PRIA Assessment: EPA Category No. R300 ; Decision time: 4 months; Fee: \$1,434

Product: ARBOR-OTC
Company: Arborjet, Inc.
File Symbol: 74578-

Dear Ms. Joyner:

Enclosed please find the following documents submitted in support of a repack registration for Arborjet's new product, ARBOR-OTC containing the active ingredient, oxytetracycline hydrochloride:

- Application for Pesticide Registration (EPA Form 8570-1);
- Receipt for payment of PRIA fee;
- Confidential Statement of Formula and Certification Statement (2 copies);
- Formulator's Exemption Statement (EPA Form 8570-27); and
- Proposed label (5 copies)

ARBOR-OTC is a straight repack of the [REDACTED] The dosing regimen of ARBOR-OTC differs only in the volume of each injection. Arborjet has increased the amount of water per injection to aid in uptake. ARBOR-OTC delivers the same amount of product per injection as [REDACTED] If you have any questions regarding this submission, please contact me as soon as possible at (301) 680-7971 or jjones@delta-ac.com.

Sincerely,

Jeff Jones, Agent
Arborjet, Inc.

Online Payment

Step 3: Confirm Payment

1 | 2 | 3

Thank you.
Your transaction has been successfully completed.

Pay.gov Tracking Information

Application Name: PRIA Service Fees
Pay.gov Tracking ID: 2588CH5N
Agency Tracking ID: 74365420728
Transaction Date and Time: 10/09/2012 18:07 EDT

Payment Summary

Account Holder Name: Delta Analytical Corp.
Payment Amount: \$1,434.00
Account Type: Business Checking
Routing Number: 055003201
Account Number: *****9048
Check Number: 35452

Payment Date: 10/10/2012
Decision Number:
Registration Number: 74578
Company Name: Arborjet, Inc.
Company Number: 74578
Action Code: R300

10/9/2012 6:24 PM

United States Environmental Protection Agency Washington, DC 20460		<input checked="" type="checkbox"/> Registration <input type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number				
Application for Pesticide - Section I							
1. Company/Product Number 74578-		2. EPA Product Manager: Shaja Joyner	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted				
4. Company/Product Name Arbor-OTC		PM#: 20					
5. Name and Address of Applicant (Include Zip Code) Arborjet, Inc. c/o Delta Analytical Corporation 12510 Prosperity Drive, Suite 160 Silver Spring, MD 20904 <input type="checkbox"/> Check if this is new address		6. Expedited Review. In accordance with FIFRA Sec. (3)(c)(3)(b)(i), my product is similar or identical in composition and labeling to : EPA Reg. No.: [REDACTED] Product Name: [REDACTED]					
Section II							
<input type="checkbox"/> Amendment - Explain below <input type="checkbox"/> Resubmission in response to Agency letter dated: <input type="checkbox"/> Notification		<input type="checkbox"/> Final printed labels in response to Agency letter dated <input checked="" type="checkbox"/> "MeToo" Application <input type="checkbox"/> Other - Explain Below					
Explanation: Use additional page(s) if necessary. (For sections I and II.) PRIA Assessment: EPA Category No. R300 ; Decision time: 4 months; Fee: \$1,434; email contact: jjones@della-ac.com							
Section III							
1. Material This Product Will Be Packaged In :							
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">If Yes, Unit packaging weight</td> <td style="width:50%;">No. per container</td> </tr> </table>	If Yes, Unit packaging weight	No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">If Yes, package weight</td> <td style="width:50%;">No. per container</td> </tr> </table>	If Yes, package weight	No. per container	2. Type of container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other: (Specify)
If Yes, Unit packaging weight	No. per container						
If Yes, package weight	No. per container						
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) of Retail Container: 0.1 oz. / 2.8 g; 0.2 oz. / 5.6 g; 1.0 oz. / 28 g; 5.0 oz. / 140 g		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product				
6. Manner in which Label is affixed to product: <input type="checkbox"/> Lithograph <input type="checkbox"/> Stenciled <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Other							
Section IV							
1. Contact Point							
Name Jeff Jones		Title: Agent, Arborjet, Inc.	Telephone No.: 301 630-7971				
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			Date Application Received (Stamped) <div style="border: 1px solid black; width: 100px; height: 100px; margin: 0 auto;"></div>				
2. Signature		3. Title: Agent, Arborjet, Inc.					
4. Typed Name Jeff Jones		5. Date October 9, 2012					

EPA

United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address Arborjet, Inc. c/o Delta Analytical Corporation 12510 Prosperity Drive, Suite 160 Silver Spring, MD 20904	EPA File Symbol/Registration Number 74578-
	Product Name Arbor-OTC
	Date of Confidential Statement of Formula (EPA Form 8570-4) October 9, 2012

As an authorized representative of the applicant for registration of the product identified above, I certify that:

- (1) This product contains the following active ingredient(s):

oxytetracycline hydrochloride

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

- (3) Indicate by checking (A) or (B) below which paragraph applies:


☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

- (4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
oxytetracycline hydrochloride		
Product ingredient source information may be entitled to confidential treatment		
Signature 	Name and Title Jeff Jones, Agent Arborjet, Inc.	Date October 9, 2012

ARBOR-OTC

[Sub-label 1: Palm Tree Use]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing palms including Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline).

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none">▪ Hold eye open and rinse slowly and gently with water for 15-20 minutes.▪ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.▪ Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">▪ Move person to fresh air.▪ If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.▪ Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application in Palm Trees

Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline) in Palms using the Arborjet Injection System

Apply to Palms 3-4 times annually for continuous protection from Phytoplasma Disease. For suppression of symptoms in a symptomatic palm use up to 3 times the amounts described in the table under Application Instructions. Once symptoms subside return to a preventative dosing schedule.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate Number of Palms Treated
140 g (5.0 oz.)	1250 mls	1320 mls	50
28g (1.0 oz.)	250 mls	264 mls	10
5.6g (0.2 oz.)	50 mls	52.8 mls	2
2.8g (0.1 oz.)	25 mls	26.4 mls	1

1. Determine total number of doses desired for project or container size.
2. Add quantity of ARBOR-OTC from step one into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 10 palms.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Application Instructions: Due to the nature of the Palm's vascular system only one injection site is needed per palm per application.

Small Palm	Average Palm	Large Palm
< 6' Clear Trunk	6' – 15' Clear Trunk	> 15' Clear Trunk
16 mls of Solution	~26 mls of Solution	35 mls of Solution

Trunk diameter should be taken into consideration. A small trunk diameter can reduce by one category the dose required and a large trunk diameter can increase by one category the dose required

Treating Palms

Inject into the trunk into lignified (hardened, woody) tissues typically within 2-3 ft. of the soil. Drill into the stem 4" as instructed below. Inject through the Arborplug. Only one injection site is needed.

Using the STINGER Tip for Palms

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfect needles between trees.

Using Arborplugs™ for Palms

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug using the set tool and hammer. Inject by Inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Additional Injections in a Single Palm:

Additional injections can use the same hole as long as new tissue is accessed deeper in the hole. For additional injections:

Arborplug

Remove the plug and use a 3/16 drill bit and drill 1/2 inch deeper.

Drill the Arborplug hole 1/2 inch deeper and replace it with a new Arborplug*.

Inject Prescribed dose as instructed above using Arborplug.

Stinger

Use 3/16 inch drill to drill hole ½ inch deeper

Inject prescribed dose as outlined above for Stinger Tip

*Note: If you originally used the # 3 Arborplug, for re-treatment we recommend replacing with a # 4 Arborplug to more easily make the application using the original injection site.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool (<77°F, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke, or equivalent. Offer for recycling if available. If not, discard in sanitary landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Notice: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Tree injury, ineffectiveness or other unintended consequence may result because of such factors as manner of use or application, weather or tree conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ARBORJET, INC., or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ARBORJET, INC. and Seller harmless for any claims relating to such factors.

ARBORJET, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions. This warranty does not extend to the use of the product contrary to label instructions, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARBORJET, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

ARBORJET, INC. and Seller offer this product, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of ARBORJET, INC.

**Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801**

This label may contain some or all of the following statements. ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Phytoplasma Disease
Palms

ARBOR-OTC

[Sub-label 2: Label for use in all other trees except Palm]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing trees including Bacterial Leaf Scorch.

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none">▪ Hold eye open and rinse slowly and gently with water for 15-20 minutes.▪ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.▪ Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">▪ Move person to fresh air.▪ If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.▪ Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application Method

For treatment of Bacterial Leaf Scorch, Fire Blight and Ash Yellows using the Arborjet Injection System

Apply once per growing season in spring after leaves have fully developed. Scorch symptoms are suppressed only during the growing season in which treatment is administered. Re-treatment is required during each growing season for continued suppression.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate DBH inches of Tree Treated
140g (5.0 oz.)	1250 mls	1320 mls	500 inches
28g (1.0 oz.)	250 mls	264 mls	100 inches
2.8g (0.1 oz.)	25 mls	26.4 mls	10 inches
1.4g (0.05 oz.)	12.5 mls	13.2 mls	5 inches

1. Measure the tree diameter at breast height (DBH) to determine the dose that is needed.
2. Add quantity of ARBOR-OTC from step one into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 100 DBH inches of trees.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Injection into Trees:

To determine the application/dose rate per tree:

- 1) Measure the tree diameter in inches at chest height (4½ feet from ground) to find the Diameter at Breast Height (DBH). (If measuring tree circumference, divide circumference by 3 to obtain the DBH in inches.)
- 2) Calculate the number of injection sites by dividing the DBH in inches by 2.
- 3) Divide the total dose by the number of injection sites to determine required dosage per injection site.

Example: For a tree with a DBH of 10 inches (or circumference of 30 inches):

- 1) DBH = 10" (circumference 30" ÷ 3 = 10").
- 2) Divide DBH of 10" by 2 = 5 injection sites.
- 3) Divide 26.4 mL by 5 injection sites = 5.28 mL per injection site.

Using the STINGER Tip

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfest needles between trees.

Using Arborplugs™

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug, countersink to the thickness of the bark using the set tool and hammer. Inject by Inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Future Injections in the Same Tree:

Future injections in the same tree are applied into new holes placed intermediate to the old injection sites. Drill new sites either above or below (by 2" vertically) to the old sites and 2 to 3" horizontally from them. Applied correctly, this will form a triangular pattern with the old sites.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool (<77°F, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke or equivalent. Offer for recycling if available. If not, discard in sanitary landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Notice: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Tree injury, ineffectiveness or other unintended consequence may result because of such factors as manner of use or application, weather or tree conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ARBORJET, INC. or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ARBORJET, INC. and Seller harmless for any claims relating to such factors.

ARBORJET, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions. This warranty does not extend to the use of the product contrary to label instructions, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARBORJET, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

ARBORJET, INC. and Seller offer this product, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of ARBORJET, INC

**Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801**

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This label may contain some or all of the following statements.

ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Ash Yellows	Cotoneaster	Witches' Broom (caused by mycoplasma-like organisms)
Ash	Crabapple	Apple
Bacterial blast	Creambush	Ash
Apple	Firethorn	Dogwood
Pear	Flowering Quince	Elm
Bacterial Blight	Hawthorn	Lilac
Flowering Crabapple	Indian Hawthorn	Locust
Hawthorn	Loquat	Peach
Lilac	Mountain Ash	Sassafras
Walnut	Ninebark	X-Disease
Bacterial Canker	Pear	Cherry
Hickory	Pearlbush	Chokecherry
Horsechestnut	Photinia	Nectarine
Maple	Plum	Peach
Mimosa	Quince	Plum
Oak	Rose	
Persian Walnut	Serviceberry	
Walnut	Fruit Spot	
Bacterial Leaf Scorch	Avocado	
Elm	Leaf and Shoot Blight	
Gum	Mock Orange	
Oak	Leaf Blight and Brown Rot	
Oleander	Mandarin Orange	
Sycamore	Leaf Spot	
Blossom Blast	Basswood	
Citrus	Hibiscus	
Grapefruit	Magnolia	
Lime	Lethal Decline	
Tea rose	Basswood	
Walnut	Hibiscus	
Blossom Blight and Canker	Magnolia	
Almond	Phloem Necrosis	
Apricot	Elm	
Cherry	Stem Canker	
Peach	Poplar	
Pear	Stubborn Disease	
Plum	Citrus	
Bunch Disease	Tip Dieback	
Butternut	Maple	
Pecan	Vascular Yellows	
Walnut	Ash	
Crown Gall	Elm	
Flowering Quince	Wetwood / Slime Flux	
Quince	Apple	
Decline	Cherry	
Peach	Elm	
Pear	Hickory	
Nectarine	Maple	
Fire Blight	Oak	
Apple	Peach	
Apricot	Pear	
Cherry	Plum	
Chokecherry	Poplar	
Cliff rose	Walnut	

ARBOR-OTC

[Sub-label 1: Palm Tree Use]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing palms including Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline).

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none">▪ Hold eye open and rinse slowly and gently with water for 15-20 minutes.▪ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.▪ Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">▪ Move person to fresh air.▪ If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.▪ Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application in Palm Trees

Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline) in Palms using the Arborjet Injection System

Apply to Palms 3-4 times annually for continuous protection from Phytoplasma Disease. For suppression of symptoms in a symptomatic palm use up to 3 times the amounts described in the table under Application Instructions. Once symptoms subside return to a preventative dosing schedule.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate Number of Palms Treated
140 g (5.0 oz.)	1250 mls	1320 mls	50
28g (1.0 oz.)	250 mls	264 mls	10
5.6g (0.2 oz.)	50 mls	52.8 mls	2
2.8g (0.1 oz.)	25 mls	26.4 mls	1

1. Determine total number of doses desired for project or container size.
2. Add quantity of ARBOR-OTC from step one into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 10 palms.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Application Instructions: Due to the nature of the Palm's vascular system only one injection site is needed per palm per application.

Small Palm	Average Palm	Large Palm
< 6' Clear Trunk	6' – 15' Clear Trunk	> 15' Clear Trunk
16 mls of Solution	~26 mls of Solution	35 mls of Solution

Trunk diameter should be taken into consideration. A small trunk diameter can reduce by one category the dose required and a large trunk diameter can increase by one category the dose required

Treating Palms

Inject into the trunk into lignified (hardened, woody) tissues typically within 2-3 ft. of the soil. Drill into the stem 4" as instructed below. Inject through the Arborplug. Only one injection site is needed.

Using the STINGER Tip for Palms

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfest needles between trees.

Using Arborplugs™ for Palms

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug using the set tool and hammer. Inject by Inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Additional Injections in a Single Palm:

Additional injections can use the same hole as long as new tissue is accessed deeper in the hole. For additional injections:

Arborplug

Remove the plug and use a 3/16 drill bit and drill 1/2 inch deeper.

Drill the Arborplug hole 1/2 inch deeper and replace it with a new Arborplug*.

Inject Prescribed dose as instructed above using Arborplug.

Stinger

Use 3/16 inch drill to drill hole 1/2 inch deeper

Inject prescribed dose as outlined above for Stinger Tip

*Note: If you originally used the # 3 Arborplug, for re-treatment we recommend replacing with a # 4 Arborplug to more easily make the application using the original injection site.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool (<77°F, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke, or equivalent. Offer for recycling if available. If not, discard in sanitary landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Notice: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Tree injury, ineffectiveness or other unintended consequence may result because of such factors as manner of use or application, weather or tree conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ARBORJET, INC., or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ARBORJET, INC. and Seller harmless for any claims relating to such factors.

ARBORJET, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions. This warranty does not extend to the use of the product contrary to label instructions, and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARBORJET, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.

ARBORJET, INC. and Seller offer this product, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of ARBORJET, INC.

**Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801**

This label may contain some or all of the following statements. ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Phytoplasma Disease
Palms

ARBOR-OTC
can be used to treat
the following bacterial
diseases in the following
trees:

Phytoplasma Disease
Palms

ARBOR-OTC

[Sub-label 2: Label for use in all other trees except Palm]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing trees including Bacterial Leaf Scorch.

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none">▪ Hold eye open and rinse slowly and gently with water for 15-20 minutes.▪ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.▪ Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">▪ Move person to fresh air.▪ If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.▪ Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application Method

For treatment of Bacterial Leaf Scorch, Fire Blight and Ash Yellows using the Arborjet Injection System

Apply once per growing season in spring after leaves have fully developed. Scorch symptoms are suppressed only during the growing season in which treatment is administered. Re-treatment is required during each growing season for continued suppression.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate DBH inches of Tree Treated
140g (5.0 oz.)	1250 mls	1320 mls	500 inches
28g (1.0 oz.)	250 mls	264 mls	100 inches
2.8g (0.1 oz.)	25 mls	26.4 mls	10 inches
1.4g (0.05 oz.)	12.5 mls	13.2 mls	5 inches

1. Measure the tree diameter at breast height (DBH) to determine the dose that is needed.
2. Add quantity of ARBOR-OTC from step one into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 100 DBH inches of trees.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Injection into Trees:

To determine the application/dose rate per tree:

- 1) Measure the tree diameter in inches at chest height (4½ feet from ground) to find the Diameter at Breast Height (DBH). (If measuring tree circumference, divide circumference by 3 to obtain the DBH in inches.)
- 2) Calculate the number of injection sites by dividing the DBH in inches by 2.
- 3) Divide the total dose by the number of injection sites to determine required dosage per injection site.

Example: For a tree with a DBH of 10 inches (or circumference of 30 inches):

- 1) $DBH = 10''$ (circumference $30'' \div 3 = 10''$).
- 2) Divide DBH of 10" by 2 = 5 injection sites.
- 3) Divide 26.4 mL by 5 injection sites = 5.28 mL per injection site.

Using the STINGER Tip

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfect needles between trees.

Using Arborplugs™

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug, countersink to the thickness of the bark using the set tool and hammer. Inject by Inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Future Injections in the Same Tree:

Future injections in the same tree are applied into new holes placed intermediate to the old injection sites. Drill new sites either above or below (by 2" vertically) to the old sites and 2 to 3" horizontally from them. Applied correctly, this will form a triangular pattern with the old sites.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool ($<77^{\circ}\text{F}$, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke, or equivalent. Offer for recycling if available. If not, discard in sanitary landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

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ARBORJET, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions. This warranty does not extend to the use of the product contrary to label instructions, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARBORJET, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

ARBORJET, INC. and Seller offer this product, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of ARBORJET, INC.

**Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801**

This label may contain some or all of the following statements.

ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Ash Yellows	Cotoneaster	Witches' Broom (caused by mycoplasma-like organisms)
Ash	Crabapple	Apple
Bacterial blast	Creambush	Ash
Apple	Firethorn	Dogwood
Pear	Flowering Quince	Elm
Bacterial Blight	Hawthorn	Lilac
Flowering Crabapple	Indian Hawthorn	Locust
Hawthorn	Loquat	Peach
Lilac	Mountain Ash	Sassafras
Walnut	Ninebark	X-Disease
Bacterial Canker	Pear	Cherry
Hickory	Pearlbush	Chokecherry
Horsechestnut	Photinia	Nectarine
Maple	Plum	Peach
Mimosa	Quince	Plum
Oak	Rose	
Persian Walnut	Serviceberry	
Walnut	Fruit Spot	
Bacterial Leaf Scorch	Avocado	
Elm	Leaf and Shoot Blight	
Gum	Mock Orange	
Oak	Leaf Blight and Brown Rot	
Oleander	Mandarin Orange	
Sycamore	Leaf Spot	
Blossom Blast	Basswood	
Citrus	Hibiscus	
Grapefruit	Magnolia	
Lime	Lethal Decline	
Tea rose	Basswood	
Walnut	Hibiscus	
Blossom Blight and Canker	Magnolia	
Almond	Phloem Necrosis	
Apricot	Elm	
Cherry	Stem Canker	
Peach	Poplar	
Pear	Stubborn Disease	
Plum	Citrus	
Bunch Disease	Tip Dieback	
Butternut	Maple	
Pecan	Vascular Yellows	
Walnut	Ash	
Crown Gall	Elm	
Flowering Quince	Wetwood / Slime Flux	
Quince	Apple	
Decline	Cherry	
Peach	Elm	
Pear	Hickory	
Nectarine	Maple	
Fire Blight	Oak	
Apple	Peach	
Apricot	Pear	
Cherry	Plum	
Chokecherry	Poplar	
Cliff rose	Walnut	

ARBOR-OTC

[Sub-label 1: Palm Tree Use]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing palms including Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline).

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none">▪ Hold eye open and rinse slowly and gently with water for 15-20 minutes.▪ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.▪ Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">▪ Move person to fresh air.▪ If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.▪ Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application in Palm Trees

Phytoplasma Disease (Lethal Yellowing and Texas Phoenix Palm Decline) in Palms using the Arborjet Injection System

Apply to Palms 3-4 times annually for continuous protection from Phytoplasma Disease. For suppression of symptoms in a symptomatic palm use up to 3 times the amounts described in the table under Application Instructions. Once symptoms subside return to a preventative dosing schedule.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate Number of Palms Treated
140 g (5.0 oz.)	1250 mls	1320 mls	50
28g (1.0 oz.)	250 mls	264 mls	10
5.6g (0.2 oz.)	50 mls	52.8 mls	2
2.8g (0.1 oz.)	25 mls	26.4 mls	1

1. Determine total number of doses desired for project or container size.
2. Add quantity of ARBOR-OTC from step one into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 10 palms.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Application Instructions: Due to the nature of the Palm's vascular system only one injection site is needed per palm per application.

Small Palm	Average Palm	Large Palm
< 6' Clear Trunk	6' – 15' Clear Trunk	> 15' Clear Trunk
16 mls of Solution	~26 mls of Solution	35 mls of Solution

Trunk diameter should be taken into consideration. A small trunk diameter can reduce by one category the dose required and a large trunk diameter can increase by one category the dose required

Treating Palms

Inject into the trunk into lignified (hardened, woody) tissues typically within 2-3 ft. of the soil. Drill into the stem 4" as instructed below. Inject through the Arborplug. Only one injection site is needed.

Using the STINGER Tip for Palms

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfest needles between trees.

Using Arborplugs™ for Palms

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug using the set tool and hammer. Inject by Inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Additional Injections in a Single Palm:

Additional injections can use the same hole as long as new tissue is accessed deeper in the hole. For additional injections:

Arborplug

Remove the plug and use a 3/16 drill bit and drill 1/2 inch deeper.

Drill the Arborplug hole 1/2 inch deeper and replace it with a new Arborplug*.

Inject Prescribed dose as instructed above using Arborplug.

Stinger

Use 3/16 inch drill to drill hole ½ inch deeper

Inject prescribed dose as outlined above for Stinger Tip

*Note: If you originally used the # 3 Arborplug, for re-treatment we recommend replacing with a # 4 Arborplug to more easily make the application using the original injection site.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep tightly closed and sealed. Product is moisture, temperature and light sensitive. Product is hygroscopic so protect from moisture. Store in a cool (<77°F, 25°C), dry place away from heat and open flames with minimum exposure to the atmosphere. Avoid extremes in temperature. If the injection device does not completely empty within a few hours, depressurize the device and remove from the tree in an inverted position to avoid the solution leaking.

Pesticide Disposal: Wastes resulting from use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse the container to remove any leftover residue from the container. Then offer for recycling if available or dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke. or equivalent. Offer for recycling if available. If not, discard in sanitary landfill.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Notice: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Tree injury, ineffectiveness or other unintended consequence may result because of such factors as manner of use or application, weather or tree conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ARBORJET, INC., or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ARBORJET, INC. and Seller harmless for any claims relating to such factors.

ARBORJET, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions. This warranty does not extend to the use of the product contrary to label instructions, and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARBORJET, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the fullest extent permitted by applicable law, ARBORJET, INC. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.

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**Arborjet, Inc.
99 Blueberry Hill Rd.
Woburn, MA. 01801**

This label may contain some or all of the following statements. ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Phytoplasma Disease
Palms

ARBOR-OTC

[Sub-label 2: Label for use in all other trees except Palm]

ARBOR-OTC is a systemic water soluble injectable antibiotic for the control of certain bacterial diseases in non-food bearing trees including Bacterial Leaf Scorch.

Active Ingredient:

Oxytetracycline Hydrochloride*	39.60%
Other Ingredients	60.40%
Total	100.00%

*Equivalent to 36.7% oxytetracycline

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

FIRST AID	
If in Eyes	<ul style="list-style-type: none">▪ Hold eye open and rinse slowly and gently with water for 15-20 minutes.▪ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.▪ Call a Poison Control Center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">▪ Move person to fresh air.▪ If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.▪ Call a poison control center or doctor for future treatment advice.
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may contact the American Association of Poison Control Centers at 1-800-222-1222 for emergency medical treatment information.	

Net Contents:

[2.8g / 0.1 oz.]; [5.6g / 0.2 oz.]; [28g / 1.0 oz.]; [140g / 5.0 oz.]

EPA Reg. No 74578-
EPA Est. No. 74578-MA-001

Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if inhaled. Avoid breathing dust. Do not get in eyes or on clothing. Wear protective eyewear (goggles, facemask or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistant category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt
- Long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

User Safety Requirements

- Follow manufacturer's instructions for cleaning/maintaining PPE.
- If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing/PPE.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Restrictions

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. To be used on non-crop bearing ornamentals only. **Fruit and nuts from treated trees are not for consumption.**

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box apply to uses that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear:

- Coveralls over long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear

Application Methods

ARBOR-OTC is designed for use with Arborjet Tree Injection Systems. It may be used with other injection devices that meet the application and label requirements. ARBOR-OTC can be used with a variety of root flare and/or trunk injection devices. For all injection devices, read carefully and follow all manufacturer use directions. Most injection devices may require several minutes or more to empty into tree, however, some may take longer to empty depending on the health of the treated tree and local weather conditions. Do not leave the injection devices unattended. Do not leave empty injection devices on trees. Promptly and safely remove them according to manufacturer's directions. Follow the manufacturer's directions for proper cleaning and storage of the injection device.

Application Method

For treatment of Bacterial Leaf Scorch, Fire Blight and Ash Yellows using the Arborjet Injection System

Apply once per growing season in spring after leaves have fully developed. Scorch symptoms are suppressed only during the growing season in which treatment is administered. Re-treatment is required during each growing season for continued suppression.

Mixing Instructions

1 tsp. (5cc) of this product = 2.8 grams (0.1 oz.)

Quantity of ARBOR-OTC	Amount of Water to Add	Yield of Mixed Solution	Approximate DBH inches of Tree Treated
140g (5.0 oz.)	1250 mls	1320 mls	500 inches
28g (1.0 oz.)	250 mls	264 mls	100 inches
2.8g (0.1 oz.)	25 mls	26.4 mls	10 inches
1.4g (0.05 oz.)	12.5 mls	13.2 mls	5 inches

1. Measure the tree diameter at breast height (DBH) to determine the dose that is needed.
2. Add quantity of ARBOR-OTC from step one into the delivery bottle, add purified water per Mixing Instructions. Alternatively, add 250 milliliters of purified water into the 28g container of ARBOR-OTC and use to treat 100 DBH inches of trees.
3. Replace lid and shake vigorously for several minutes until powder is completely dissolved.

Injection into Trees:

To determine the application/dose rate per tree:

- 1) Measure the tree diameter in inches at chest height (4½ feet from ground) to find the Diameter at Breast Height (DBH). (If measuring tree circumference, divide circumference by 3 to obtain the DBH in inches.)
- 2) Calculate the number of injection sites by dividing the DBH in inches by 2.
- 3) Divide the total dose by the number of injection sites to determine required dosage per injection site.

Example: For a tree with a DBH of 10 inches (or circumference of 30 inches):

- 1) DBH = 10" (circumference 30" ÷ 3 = 10").
- 2) Divide DBH of 10" by 2 = 5 injection sites.
- 3) Divide 26.4 mL by 5 injection sites = 5.28 mL per injection site.

Using the STINGER Tip

Use a 7/32" diameter drill bit. Push STINGER needle into hole and twist right for a snug fit; start application, and remove the STINGER needles upon completion. The STINGER Method requires no Arborplugs. Clean and disinfect needles between trees.

Using Arborplugs™

Use the 9/32" drill bit for the #3 Arborplug and the 3/8" diameter drill bit for the #4 Arborplug. Drill bits should be clean and sharp. Insert the Arborplug, countersink to the thickness of the bark using the set tool and hammer. Inject by Inserting the VIPER needle, start application, and remove the VIPER needle upon completion. The Arborplug will remain in the tree.

Future Injections in the Same Tree:

Future injections in the same tree are applied into new holes placed intermediate to the old injection sites. Drill new sites either above or below (by 2" vertically) to the old sites and 2 to 3" horizontally from them. Applied correctly, this will form a triangular pattern with the old sites.

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99 Blueberry Hill Rd.
Woburn, MA. 01801**

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ARBOR-OTC can be used to treat the following bacterial diseases in the following trees:

Ash Yellows	Cotoneaster	Witches' Broom (caused by mycoplasma-like organisms)
Ash	Crabapple	Apple
Bacterial blast	Creambush	Ash
Apple	Firethorn	Dogwood
Pear	Flowering Quince	Elm
Bacterial Blight	Hawthorn	Lilac
Flowering Crabapple	Indian Hawthorn	Locust
Hawthorn	Loquat	Peach
Lilac	Mountain Ash	Sassafras
Walnut	Ninebark	X-Disease
Bacterial Canker	Pear	Cherry
Hickory	Pearlbush	Chokecherry
Horsechestnut	Photinia	Nectarine
Maple	Plum	Peach
Mimosa	Quince	Plum
Oak	Rose	
Persian Walnut	Serviceberry	
Walnut	Fruit Spot	
Bacterial Leaf Scorch	Avocado	
Elm	Leaf and Shoot Blight	
Gum	Mock Orange	
Oak	Leaf Blight and Brown Rot	
Oleander	Mandarin Orange	
Sycamore	Leaf Spot	
Blossom Blast	Basswood	
Citrus	Hibiscus	
Grapefruit	Magnolia	
Lime	Lethal Decline	
Tea rose	Basswood	
Walnut	Hibiscus	
Blossom Blight and Canker	Magnolia	
Almond	Phloem Necrosis	
Apricot	Elm	
Cherry	Stem Canker	
Peach	Poplar	
Pear	Stubborn Disease	
Plum	Citrus	
Bunch Disease	Tip Dieback	
Butternut	Maple	
Pecan	Vascular Yellows	
Walnut	Ash	
Crown Gall	Elm	
Flowering Quince	Wetwood / Slime Flux	
Quince	Apple	
Decline	Cherry	
Peach	Elm	
Pear	Hickory	
Nectarine	Maple	
Fire Blight	Oak	
Apple	Peach	
Apricot	Pear	
Cherry	Plum	
Chokecherry	Poplar	
Cliff rose	Walnut	

CERTIFICATION STATEMENT

I hereby certify that, for purposes of FIFRA sec. 12(a)(1)(C), the description of the composition of **Arbor-OTC**, EPA File Symbol 74578- refers to the composition set forth on the Statement of Formula and supporting materials. This description includes the representations that:

- 1) no ingredient will be present in the product in an amount greater than the upper certified limit or in an amount less than the lower certified limit specified for that ingredient in a currently approved Statement of Formula; and
- 2) if the Agency requires that the source of supply of an ingredient be specified, that all quantities of such ingredient will be obtained from the source specified in the Statement of Formula.

Company: Arborjet, Inc.

Company Agent: Jeff Jones

Signature:



Date: October 9, 2012

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